

# Privacy Policy

This Privacy Policy has been compiled in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council) and the Personal Data Protection Act and is applicable to **Höbenool OÜ** customers and potential customers who have requested that.

The website and social media of Höbenool OÜ use cookies to offer service for the user, analyze and improve the user experience, and for more effective marketing. By visiting the website and social media of Höbenool OÜ, the user agrees to the use of cookies in the manner described herein. A cookie is a small text file that is stored on a user's device. Cookies are generally used to collect statistical data with the attention on users' preferences when visiting various websites. That information is then used to measure and improve the efficiency of the website; and to carry out more effective marketing. To restrict the use of cookies, the users can set their own preferences through their browser settings. However, Google Analytics may collect data from users' activity even without using cookies. In order to prevent Google Analytics from using data, users can install a Google Analytics blocker on their device.

The Privacy Policy is an integral part of contracts to be entered into between Höbenool and the customer and contains the following information:

- the type of personal information we collect;
- why and on what basis we collect your personal information;
- how we handle your personal information;
- your rights;
- our contact details so that you can receive information about your rights regarding the processing of your personal data and exercise those rights.

## Useful definitions

For the purposes of these rules, Höbenool uses the following terms:

**Customer** - a natural or legal person who uses, has used or has expressed a desire to purchase the goods and services offered by Höbenool or is otherwise connected with the services of Höbenool.

**Data subject** - a natural person about whom Höbenool has information to identify the person. Data subjects include, for example, individual customers, visitors, inquirers and questioners / requesters, business partners, legal customer representatives and, in the case of rental service, the details of the rental car user, in addition to those of the lessee. Also referred to as a **person** or **customer** in this privacy policy statement.

**Personal data** – any information relating to an identified or identifiable natural person ("data subject").

**Processing** – any automated or non-automated activity consisting in collecting, documenting, organizing, structuring, storing, adapting and modifying, making inquiries of, reading, using, transmitting, disclosing by dissemination or otherwise making available, restricting, combining or merging, deleting, and destroying personal data or sets of such data .

## Personal Data

Höbenool processes customers' personal data only on the bases and for the purposes set forth in the Personal Data Protection Act and this Privacy Policy. Höbenool processes the following personal information of customers:

<b>Identifying information</b>	<ul style="list-style-type: none"><li>• Name, contact details, including email and phone number, personal identification code / date of birth, copy of identity document, bank account details</li></ul>
<b>Customer's right of representation</b>	<ul style="list-style-type: none"><li>• information on the affiliation of the person with legal persons (eg data provided by the person or appearing in public registers, basis of representation or other relationships for the representation and performance of transactions on behalf of the legal person);</li><li>• information on powers of attorney (personal data of the users of a rental car or other vehicles);</li></ul>
<b>Vehicle details</b>	<ul style="list-style-type: none"><li>• vehicle details required for the sale of goods and provision of services (vehicle registration number, vehicle identification number VIN, gearbox information, other data related to the vehicle);</li><li>• vehicle location information (for rented vehicles);</li></ul>
<b>Other information</b>	<ul style="list-style-type: none"><li>• details of goods sold and services ordered (including past work, quotes, correspondence, communication with the customer by phone, by correspondence or verbally, statements, complaints, etc);</li><li>• customer's credit information, limits, leases, previous payments / arrears;</li><li>• personal images and operations with vehicles recorded with camcorders installed in the workshop and offices of Höbenool;</li><li>• data obtained or created in the course of the performance of legal obligations, such as data generated by inquiries of investigative bodies, consumer protection, notaries, courts and bailiffs.</li></ul>

Höbenool collects the above data in different ways:

- information disclosed by the person to Höbenool (eg through inquiries, requests and contracting), data resulting from communications (eg through correspondence, telephone calls, disclosed verbally and otherwise, which shall be recorded accordingly);
- information disclosed by the individual on the Internet and social media;
- information received on payment for goods and services (card payments, bank transfer information, etc);
- data received from third parties - from public registers, authorities (eg Road Administration);
- previous information on the person and vehicle stored in the databases of Höbenool;
- visits to the website of Höbenool (eg on the person's browser and operating system used, details of the website visit (date, time, notification on opening various pages, error messages, opening frequency, movements to and from the website of Höbenool). In addition, for security purposes, in particular to prevent and detect attacks and fraud attempts on the website, the IP address of the person and the name of the Internet service provider are recorded.
- Information from GPS devices in rental cars, camera recordings in the offices and workshop of Höbenool to protect the assets of Höbenool.

## Purpose and basis of data processing

Höbenool has a legal basis and interest in processing personal data of customers or customer representatives during the establishment, duration and termination of collaboration and customer relationship, and to maintain personally identifiable information throughout the process, including for legal obligations, claims, and litigation.

Höbenool collects and processes personal data primarily in situations and for purposes as follows:

<b>For the purpose and on the basis of performance of contracts</b>	<ul style="list-style-type: none"> <li>• Identification of the customer and identification of the right of representation;</li> <li>• providing products and services of Höbenool, in particular, making price quotes, concluding and executing customer contracts;</li> <li>• organizing and recording customer communications, updating and improving personal information, keeping records of customer work based on performance of the contract, performance of pre-contractual activities at the customer's request, by consent of the person, or fulfilling other legal obligations;</li> <li>• ensuring customers' payment obligations (including for operations arising from leasing contracts), resolving and clarifying customer complaints;</li> <li>• submitting claims by Höbenool or participating in proceedings;</li> </ul>
<b>To fulfill legal obligations</b>	<ul style="list-style-type: none"> <li>• transfer of personal data to authorized processors, national or supervisory authorities, as appropriate;</li> <li>• protecting the property of Höbenool and customers;</li> </ul>
<b>By legitimate interest</b>	<ul style="list-style-type: none"> <li>• provision of additional services, including organization of customer events, conducting market analysis and customer surveys, analyzing customer preferences with the aim of improving the process of selling goods and providing services to customers;</li> <li>• protecting and safeguarding the legitimate interests of customers and Höbenool to improve the quality of the Höbenool services, to prove business relationship or other communication with customers;</li> <li>• arranging recordings of camcorders installed in the offices and workshops of Höbenool to protect the proprietary rights of Höbenool, to preserve evidence for dealing with incidents (including customer claims);</li> <li>• tracking the GPS devices (including location) of the car rented to a customer to protect Höbenool in case of property theft;</li> <li>• developing and improving products and services or IT systems and ensuring data protection;</li> <li>• capturing organized events with general photos and / or filming to introduce products and services to customers and offer interesting events. The created video material and photos are the property of Höbenool and Höbenool has the right to use and publish such material at its sole discretion on the website, social media and public media;</li> </ul>
<b>With the customer's consent</b>	<ul style="list-style-type: none"> <li>• transmission of information for marketing purposes to introduce products and services offered by Höbenool and for sending other marketing information, for direct marketing through customer contacts.</li> </ul>

## Access to Personal Data and Security

Höbenool guarantees the confidentiality of customer data required by law and protects personal data against unauthorized access, unauthorized processing or disclosure, accidental loss, alteration or destruction.

Only the legal representatives of Höbenool or its designated employees have access to personal data. Certain personal data may be transferred to a third party, ie to an authorized processor, for the purpose of fulfilling contractual and legal obligations (see data sharing below).

Höbenool organizes the exchange of all information in a secure manner, using multiple personal access and identification codes and secure communication channels, thus preventing access by third parties and minimizing the risk of data leakage.

## Data Sharing

Höbenool transmits the customer's personal data to third parties, if required by law, necessary for the operation of Höbenool, or for performing its obligations or rights arising from law or on any other legal basis. Personal data submitted to authorized processors shall be processed on the grounds provided by law and only to the extent necessary.

Höbenool transfers personal information to the following recipients:

- authorized processors for organizing the operation of Höbenool (eg for the accounting service provider, IT systems manager, eg client program manager, business software, accounting software, archiving service, etc);
- authorities (law enforcement agencies, bailiffs, bankruptcy trustees, notaries, court, road administration, etc);
- third parties involved in the sale of goods, provision of services and performance of the contract with the customer - payment agents, various lessors, providers of communication, IT and postal services , courier service providers, advertising and marketing specialists;
- legal advisers, financial advisers, insurers;
- new creditor in case of assignment of the right of claim;
- camera security provider and GPS service provider for rental cars.

## Personal Data Retention and Time

Höbenool does not process personal data for longer than necessary for the fulfillment of the purposes related to the respective data, including fulfillment of the data retention obligation established by legislation.

- Customer contract information is retained for three years.
- Statutory accounting records and data are kept for seven years.
- Information obtained by consent shall be kept until the consent is withdrawn.

The customer has the right to withdraw his / her consent at any time by submitting a notice to the Höbenool office by e-mail or physically on site. The withdrawal of consent shall not affect the lawfulness of the processing of personal data prior to the withdrawal of the consent.

Personal data are processed within the European Union / European Economic Area. Should there be a need to process personal data on external servers, transfers will only be made to recipients located in a country with an adequate level of data protection pursuant to an appropriate decision of the European Commission or recipients certified under the data protection framework Privacy Policy (applicable to recipients located in the USA).

## Customer Rights

The customer has the following rights in connection with the organization of personal data protection in Hõbenool:

- examine personal information and, if necessary, obtain a copy of the data;
- require the correction of outdated or incorrect data;
- require the deletion of data or cessation of data processing where there is no legal basis for the storage or processing of personal data and where personal data are no longer required for processing;
- require the transfer of data to a third party;
- right of appeal to a supervisory authority.

To use the above rights, contact an office of Hõbenool. If the customer has any suspicion of misuse of his / her personal data, he / she must immediately inform the office of Hõbenool.

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Hõbenool has the right to update and change the privacy policy. Changes will be made available to customers on the website of Hõbenool.

### Contact details:

Juridical: Hõbenool OÜ

Tähnase tee 2/3, Peetri alevik, Rae vald 75312, Estonia

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