

Privacy

I General provisions and roles

1. This Privacy Policy ("**Policy**") sets out the manner in which personal data of natural persons is collected, processed and stored in connection with the provision of services by electronic means through the website in the domain auto-free.es (**the "Service"**). Within the meaning of the Policy:
 - a) **User** – means any person who visits the Website or uses the services offered by it.
 - b) **Personal data** - means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is a person 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 one or more factors specific to physical, physiological, the genetic, mental, economic, cultural or social identity of the natural person.
 - c) **Service** - all functionalities and services available on the Website, in particular the booking process.
2. The administrator of the data collected during the booking process through this Website is Adrian Nadolski, conducting business activity under the name of: Adrian Nadolski, 13/107 Grenadierów Street, 20-331 Lublin, Poland NIP: 5632392853, e-mail address: office@auto-free.es. (hereinafter: "**Administrator**").
3. Once the reservation has been submitted for processing, only the selected contractor (hereinafter referred to as the "**Contractor**") becomes the data controller: AN Group Spain S.L. Ctra. Carril de Guetara, 68, Churriana, 29004 Málaga, Spain, NIF: B70970108.
4. To the extent that the Administrator and the Contractor process the Users' personal data for their own, self-determined purposes, they are separate administrators of their personal data. A link to the Contractor's Privacy Policy is available at the stage of making a reservation.
5. The Administrator processes personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: "**GDPR**").
6. The data collected by the Administrator will be:
 - a) processed lawfully,
 - b) processed for clearly defined purposes and not subjected to further processing incompatible with those purposes,

- c) substantively correct and adequate in relation to the purposes for which they are processed,
- d) stored for no longer than is necessary to achieve the purpose of the processing.

II. Purpose and legal bases of data processing

1. The Administrator processes personal data necessary to provide and develop the offered reservation services available through the Website and its individual functionalities.
2. The Administrator collects the following categories of personal data during the provision of services:
 - a) identification data – name and surname, name of the Company, NIP number – optional;
 - b) contact data – phone, e-mail, address/correspondence address;
 - c) Reservation/logistics data – name of the hotel or place of stay, date and place of pick-up/drop-off of the vehicle, flight number (optional, to facilitate pick-up);
 - d) billing data – (scope visible on the payment operator's side).
3. The personal data indicated in paragraph 2 above will be processed for the following purposes:
 - a) registering an account, verifying the User's identity and performing the agreement on the provision of services by electronic means in accordance with the Act of 18 July 2002 on the provision of services by electronic means, including in particular by ensuring the possibility of using the User's account – on the basis of acceptance of the terms and conditions of the Terms and Conditions (Article 6(1)(b) of the GDPR);
 - b) accepting and handling reservations, providing the necessary personal data to the Contractor for the purpose of concluding and performing the rental agreement between the User and this Contractor, which is necessary for the performance of the agreement to which the User is to be a party (Article 6(1)(b) of the GDPR);
 - c) promotion by the Administrator of its own products and/or services and those of its Partners by sending electronic marketing information (newsletter) – based on the User's consent (Article 6(1)(a) of the GDPR) and in accordance with the Act on the Provision of Services by Electronic Means (Article 10) and the Telecommunications Law (Article 172);
 - d) to provide access to information about news from the industry directly related to the Administrator's activities, provided that the User has consented to receive such notifications via e-mail (Article 6(1)(a) of the GDPR);
 - e) for analytical and statistical purposes on the basis of the Administrator's legitimate interest in verifying the activity of Users \ the functionalities of the Website used (Article 6(1)(f) of the GDPR);

- f) to consider the complaint in accordance with the Administrator's legitimate purpose is to consider the complaint (Article 6(1)(f) of the GDPR);
- g) conducting the Administrator's operational activities, e.g. analyses, reports, statistics, verification of payment credibility, etc. (Article 6(1)(f) of the GDPR);
- h) possible establishment, pursuit or defence against claims on the basis of the Administrator's legitimate interest in the protection of its rights (Article 6(1)(f) of the GDPR);
- i) performance of legal obligations incumbent on the Administrator resulting from other provisions of law (e.g. providing information to authorities authorized to request it, complying with court decisions, etc.) (Article 6(1)(c)) GDPR in conjunction with Article 15(1), (2) and (3) of the Act of 6 June 1997. Code of Criminal Procedure).

4. Data requirement and consequences:

- a) The data required by the contract (opening and servicing an account, accepting and processing reservations, handling payments) are necessary for the conclusion and performance of the contract; failure to provide them will prevent you from creating an account, making a reservation or paying for it;
- b) Data required by law (e.g. tax and accounting settlements, issuing an invoice for an entrepreneur – NIP) provided to the extent resulting from these regulations; failure to provide them will make it impossible to meet legal obligations (e.g. issuing an invoice);
- c) You provide optional data for convenience and personalization (e.g. flight number, preferences) voluntarily; Failure to provide them does not affect the possibility of concluding a contract, but may limit personalization and service efficiency;
- d) Marketing communications/newsletters and analytical/marketing cookies are based on consent; consent is voluntary and may be withdrawn at any time without affecting the lawfulness of the processing prior to the withdrawal and without affecting the use of the main functions of the Website.

III. Period of personal data processing

1. We process data related to the User's account for the duration of the account, and after its deletion – for the period necessary to establish, pursue or defend claims: as a rule, up to 6 years, and for periodic claims and claims related to business activity – up to 3 years (the period calculated in accordance with the provisions of law);
2. We process the data relating to a reservation made without registration for the time necessary to process the reservation and then until the expiry of the relevant limitation periods for claims (as above);
3. We store documents and data processed in order to comply with tax and accounting obligations for the period resulting from the regulations – as a rule, 5 years from the end of the year in which the obligation arose;

4. We process data processed on the basis of consent (e.g. marketing/newsletter) until its withdrawal. The withdrawal of consent does not affect the lawfulness of the processing carried out before its withdrawal. After withdrawing your consent, we may store:
 - a) the minimum amount of evidentiary information on the granting and withdrawal of consent – for the period necessary to defend against claims (as a rule, up to 6 years), and;
 - b) information about the objection/withdrawal of consent on the blocking list (the so-called "do not send") so that no further communication is sent to you – for the time necessary to implement the objection.
5. After the expiry of the above periods, the data is deleted.

IV. Processing Information

1. At the time of booking confirmation, an agreement is concluded between the User and the Contractor for the provision of vehicle rental services by the Contractor to the User. Moreover:
 - a) At the time of making a reservation, the User accepts the Terms and Conditions and the Contractor's Privacy Policy and grants consent to the processing of personal data by the User for the purposes specified by the Contractor and consents to marketing communication; The Terms and Conditions and the Link to the Privacy Policy of the Contractor responsible for the selected reservation are made available at the checkout stage;
 - b) After selecting the Contractor, the Administrator discloses the reservation data to this one entity only;
 - c) The Administrator makes the User's personal data available to the Contractor to the extent necessary for the performance of the service (conclusion and performance of the contract, payment, complaints, taxes). The Contractor processes this data as a separate controller in accordance with its own privacy policy, which is made available at the latest at the first contact (Article 14 of the GDPR); The reservation system is configured in accordance with the principle of minimization (Article 5(1)(c) of the GDPR) - access to the full data of a specific reservation is granted only to the selected Contractor after the assignment of the order. Accesses are restricted by roles (RBAC, "need-to-know") and logged in and periodically reviewed;
 - d) The Contractor becomes the administrator of such User's personal data, and therefore is obliged to comply with the rules set out in the GDPR and bears responsibility for this under the provisions.
3. In some situations, the Administrator may transfer data to other recipients, if it is necessary to handle the reservation or results from the provisions of law. This applies in particular to:

- a) processors acting on behalf of the Controller pursuant to Article 28 of the GDPR, including:
 - Ideasoft Sp. z o.o., Karola Olszewskiego 6, 25-663 Kielce, NIP: 6631873232, KRS: 0000653432 — maintenance and servicing of the reservation system;
 - Viva Payment Services Single Member S.A. with its registered office in Athens, 18-20 Amarousiou-Chalandriou Street, 151 25 Maroussi, Greece, entered into the Register of Enterprises under number 122-03/13.01.2014, operating under the Bank of Greece Payment Institution License No. 1, supervised by the European Central Bank.
- b) providers of IT systems and solutions (hosting, CRM, mail, helpdesk);
- c) employees and associates of the Administrator authorized to process data;
- d) law firms, accounting and bookkeeping offices, insurers - to the extent necessary to provide their services;
- e) authorised public authorities – on the basis of and within the limits of the provisions of the law.

4. As a rule, we process data in the EEA, however, exceptionally, personal data processed by the Administrator may be transferred outside the European Economic Area. In such a case, the Controller shall exercise due diligence to adequately secure the User's personal data, and the transfer shall be based on an agreement concluded between the entity receiving the data using standard contractual clauses approved by the European Commission (SCC 2021/914) or on the basis of a decision of the European Commission establishing an adequate level of data protection or on the basis of adopted binding corporate rules.
5. If you exceptionally transfer outside the EEA, you have the right to be informed of how to obtain a copy of the security features or where to make them available.

V. Rights of data subjects

1. The User of the Website has the right to::
 - a) access to the content of your personal data;
 - b) rectification of data;
 - c) deletion of data;
 - d) restrictions on data processing;
 - e) objection to processing carried out on the basis of the legitimate interest of the controller;
 - f) withdraw your consent at any time without affecting the lawfulness of the processing that was carried out on the basis of that consent before its withdrawal.
2. To exercise the above rights, please contact us at the e-mail address: office@auto-free.es. Please include your name, email address and booking number in the email for

verification. We respond to requests promptly, no later than within 14 working days; In case of complexity or number of requests, the deadline may be extended, of which we will inform you.

3. The fulfillment of the request may affect the ability of us to provide services, including the performance of the ordered car rental service.
4. You have the right to lodge a complaint in connection with our processing of personal data to the supervisory authority, which is the President of the Office for Personal Data Protection, 2 Stawki Street, 00-193 Warsaw, Poland kancelaria@uodo.gov.pl or to the supervisory authority in your country of residence.
5. We do not use automated decision-making that produces legal effects on you within the meaning of Article 22 of the GDPR. Marketing profiling can only occur after you have consented to marketing cookies – you can object **and** withdraw your consent at any time.

VI. Data processing on social networks

1. The Administrator maintains profiles on social networks, has a public profile on social networks Facebook, Instagram and Youtube, processes personal data of visitors to the above profiles. Gains access to the User's personal data when the user observes the profile, contacts the Administrator via the social media messenger, adds a comment to the content posted by the Administrator, as well as when he or she interacts in any other way with the content published by the Administrator.
2. Personal data of visitors to the Administrator's profiles are processed together with the operator of a given social network. The legal basis is Article 6(1)(f) of the GDPR (legitimate interest of the Administrator) consisting in promoting one's own brand, operating the profile, answering questions sent via social media messengers, pursuing claims and defending against claims.
3. Depending on the User's activity, the Administrator may process the following personal data:
 - a) name and contact details;
 - b) Image (profile picture, as well as other photos visible to each user);
 - c) data contained in messages sent via social media messenger;
 - d) data on interactions on the social network profile, all information publicly available within the social network profile.
4. Information on the principles of processing can be found in the privacy policies of these services:
 - a) Youtube: <https://youtube.com/@autofreeagp?si=JLCWFprPhV1fcxYQ>
 - b) Instagram: https://www.instagram.com/autofree_rentacar/
 - c) Facebook: <https://www.facebook.com/autofreemalaga/>

VII. Cookies and tracking technologies

1. We use cookies (HTTP/HTML) on the Website, as well as related technologies such as local storage, SDK (in mobile applications), tracking pixels and device identifiers. They are used to ensure the operation of the Website, measure its performance, personalize content and – with the User's consent – for analytics and marketing.
2. Legal basis and scope of consents:
 - a) We use necessary cookies/technologies that enable the use of the Website (e.g. maintaining the login session, shopping cart/booking, security, saving privacy configurations) only to the extent necessary on the basis of Article 6(1)(f) of the GDPR (our legitimate interest in ensuring the basic functions and security of the Website) or, in relation to files necessary for the performance of a specific contract (e.g. making a reservation), pursuant to Article 6(1)(b) of the GDPR.
 - b) We use analytical, statistical and marketing cookies/technologies only after obtaining the User's prior, voluntary consent (Article 6(1)(a) of the GDPR) and in accordance with the regulations implementing the ePrivacy Directive (in Poland: Article 173 of the Telecommunications Law). Consent can be withdrawn at any time.
3. Categories of Files/Technologies Used:
 - a) Necessary (mandatory) – provide basic functions of the Website (e.g. logging in, remembering choices, security, load balancing, booking processing). Blocking them may prevent you from using the Website.
 - b) Preferences/Functionality – remembers the settings and personalization of the interface (e.g. language, location).
 - c) Analytical/statistical – help measure traffic, events and the effectiveness of the Website (e.g. using anonymized IP, sampling, aggregation).
 - d) Marketing/advertising – allow you to display ads tailored to your interests and measure their effectiveness; may come from third parties.
3. Some cookies/technologies may come from our partners (e.g. providers of analytics, advertising, social plugins). These partners act as independent controllers or joint controllers of the data for their own purposes (e.g. reach measurement, ad matching). Details can be found in their privacy policies, accessible from the consent manager panel.
4. Consent management and consent withdrawal:
 - a) You can change or withdraw your consent to the use of analytical/marketing cookies at any time by using the consent management panel.
 - b) We use consent management tools that record your choices and allow granular category selection (accept/reject/settings).
 - c) Your browser settings also allow you to block or delete cookies. Please note that blocking necessary files may limit or prevent some of the Website's functions from working.

4. If your browser or extension sends standard opt-out signals or privacy preferences (e.g., Global Privacy Control - GPC), we will endeavor to automatically honor them to the extent supported by our consent management tool (CMP) and applicable laws.
5. Retention period:
 - a) Session cookies are deleted when you close your browser;
 - b) Persistent cookies/identifiers are stored until the expiry indicated in their parameters or until you withdraw your consent/delete;
 - c) We store data from analytics and technical logs in anonymized or pseudonymized form for the period necessary for statistical and security purposes, in accordance with the principle of minimization.
6. If you agree to marketing cookies, we may conduct profiling in order to tailor content/advertising to your preferences. You can always object to profiling for direct marketing purposes and withdraw your consent in the consent manager panel.

VIII. Safety

1. The Controller shall apply appropriate technical and organisational measures to ensure the protection of the processed personal data in accordance with the risk of infringement of the rights or freedoms of natural persons, in particular:
 - a) applies regular updates of WordPress and installed plugins,
 - b) uses firewalls and systems to protect against unauthorized access,
 - c) restricts access to personal data to persons authorised and trained in data protection,
 - d) uses strong passwords and two-factor authentication for administrative accounts,
 - e) performs regular backups of data to protect it from loss,
 - f) monitors the website for security breach attempts.
2. Specialized security solutions are used to secure the site:
 - a) Plugins that monitor the integrity of system files, detect malware, and protect your site from hacking attempts and brute force attacks,
 - b) tools that reduce the number of failed login attempts, which prevents automatic attacks on user and administrator accounts.
3. In the event of detecting a security incident that may result in a breach of personal data protection, the Administrator shall take immediate actions aimed at minimizing the effects and, if necessary, notifying the competent supervisory authority and data subjects.
4. Personal data is stored in a secure server environment that meets the requirements for the protection of personal data. Access to the server is granted only to the entity

providing hosting services on the basis of an appropriate data processing entrustment agreement.

IX. Final provisions

1. The Administrator may update this Policy, in particular in the event of changes in the law, the functionality of the Website or processing processes.
2. Changes to the Policy will not limit your rights under the GDPR and other mandatory regulations.
3. In matters not regulated by the Policy, the relevant provisions of law and relevant regulations (e.g. regulations for the provision of services by electronic means) shall apply, but the provisions of these documents do not limit the rights arising from the GDPR.
4. We will inform you about changes to the Policy by means of a message on the Website; The current version is always available and marked with the date of entry into force.
5. We keep previous versions in an archive; upon request, we will make their content and expiration dates available.

Effective from 31 October 2025.