

Privacy Policy

Last Updated: January 01, 2022

Who is the Data Controller

Skywarpel Trading Limited, trading as "ABBYCAR" whose registered office is located at 15 Kimonos str, Green Park, 1057 Likavitos, Nicosia, Cyprus (hereinafter referred to as ("we", "us", "our(s)")) is responsible for the processing of your personal data collected through the direct booking in this website, bookings through our associated business partners, our rental stations, or through any other contact you may have with us. When you communicate Personal Data to us or when we collect Personal Data about you, we undertake to use it in accordance with this Policy.

What Personal Data we collect

We collect the Personal Data needed to manage, maintain and control our contractual relationship. By personal data we mean not only the data identifies you directly but also data that identifies you indirectly. The categories of Personal Data that we collect include a) Identification Data, b) Postal or Electronic email address, c) Payment Data, d) Geolocation data of the vehicle, e) Driving behavior data. In regards to the data collected during the booking process, we may request, among others, your driving license, your identity card or any other equivalent document such as a passport and a photo of you, in order to verify your identity.

Purposes of Data Processing

Below we have set out the various purposes for which we process your Personal Data based on.

- a) Contractual Relationship
 - I. To process your request for registration as a customer so we can manage the commercial relationship between us and your needs.
 - II. To manage, maintain and ensure compliance with the contractual relationship that binds us
- b) Legal Obligation
 - I. To communicate information to public authorities
 - II. To geolocate the rented vehicle in the event of justified request from local authorities
- c) Our Legitimate Interest
 - I. To perform commercial and advertising communications and actions, by any means, including through electronic communications or the equivalent, related to products or services similar to those contracted with Abbycar.
 - II. To conduct satisfaction surveys related to the products and services you contracted
 - III. To communicate your data to insurance companies with which you or Abbycar maintain a policy in force and assist you on the road in the event of casualty or accident.
 - IV. To record the geolocation data of the vehicle in our premises at the time of collection and at the time of return, in order to guarantee the control of compliance with the deadlines and location of the vehicle by the company.
 - V. To geolocate the leased vehicle in the event of reasonable grounds of theft or misappropriation

Recipients of your Personal Data

We may share your personal data among ourselves, our agents, our licensees and other companies to provide services to you. Your personal data will be disclosed, where necessary and relevant:

- a) to authorized personnel within our company and to entities in our group and/or to entities in our group franchise network, or any person appointed
- b) by any of these entities for the purposes of fulfilling your rental booking and supplying associated services
- c) to third party IT service providers for technical purposes in order to help us provide you with our products and services
- d) to law enforcement bodies and other public and private sector bodies for the purposes of dealing with alleged, or actual, road traffic or driving offences and/or associated fines; and private parking companies dealing with alleged or actual breaches of contract
- e) for the management and update of a register of customers presenting certain risks to the vehicle rental business generally or to its staff

- f) to fraud prevention agencies who will use it to verify your identity and to prevent fraud and money-laundering
- g) to companies supplying operational support in relation to:
 - I. delivery and collection of vehicles
 - II. authentication of you and your driving license history
 - III. insurers and solicitors that manage our insurance claims and/or debt recovery matters

Data Retention

Your personal data will be kept for the entire duration of the business relationship between you and Abbycar. Once the business relationship ends, steps will be taken to delete your personal data as soon as all the necessary actions to manage and terminate any obligation that may remain between the parties, performing, in that period, all the necessary administrative procedures.

Data relating to geolocation shall only be kept for the time necessary for the purposes indicated in the previous sections and shall be anonymized or deleted once these purposes have been fulfilled. Data relating to the driving behavior of users shall be anonymized immediately and, in any case, before any processing is carried out on the data after having been collected.

Notwithstanding the foregoing, your data will remain appropriately blocked, as long as liabilities of our contractual relationship performance can be derived, and for the fulfilment of other legal obligations by Centauro.

Security & Transmissions

Information is stored and accessed in various locations and cloud services. Servers which store information are primarily located in Greece and Europe, although storage may occur in other locations as well. We use reasonable administrative, technical, personnel, and physical measures to safeguard and secure the information we collect from you.

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.

Exercise your Rights

In accordance with the current legislation, you are entitled to exercise your rights of access, rectification, cancellation and objection, as well as the right of withdrawal, limitation of data processing, and the right to portability of your data, proving your identity (by submitting a copy of your national identification document or equivalent) at the following address: Skywarpel Trading Ltd (ABBYCAR), 15 Kimonos street, Green Park, 1057 Likavitos, Nicosia Cyprus or by email to dpo@abbycar.com

Changes

We reserve the right to change this Policy at any time for any reason by posting revisions on this webpage. 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 page above, and post a note on the home page of our applicable website.