

Information obligations when collecting data from the data subject pursuant to Article 13 GDPR

1. Description of the processing activity

Data protection notice in connection with vehicle reservations or the conclusion of rental or framework agreements

2. Name and contact details of the data controller

The data controller responsible for data collection is

Wucherpennig & Krohn GmbH

Birkenallee 2-4

23738 Lensahn, Germany

Tel.: +49 4363 90 310

Email: info@wucherpennig.de

3. Contact details of the Data Protection Officer

a.s.k. Datenschutz e.K.

Schulstraße 16a

91245 Simmelsdorf, Germany

Tel.: +49 9155 263 99 70

Email: info@ask-datenschutz.de

4. Purpose and legal basis of processing

4 a) Purpose of processing:

Your data is collected in order to:

- Fulfil the contract for the provision of our vehicles
- Comply with legal obligations (e.g. requests from authorities)
- Establish, exercise, or defend legal claims

4 b) Legal basis for processing

Your data is processed on the following legal bases:

- Contract initiation/fulfilment pursuant to Article 6(1)(b) GDPR
- Compliance with legal obligations pursuant to Article 6(1)(c) GDPR
- Protection of legitimate interests pursuant to Article 6(1)(f) GDPR

5. Categories of personal data

We process the following categories of personal data in particular:

- Master data (name, address, contact data, company data, contact person)
- Contract data (contents of the rental agreement, vehicle data, payment information, bank details)
- Communication data (emails, correspondence)
- Vehicle-related data (chassis number, mileage, condition, accident and damage reports)
- Telematics and geolocation data (location, movement profiles, operating status of the vehicles), insofar as this is necessary for the execution of the agreement or recovery of the vehicle

6. Processing of vehicle and geolocation data

Our vehicles are equipped with technical systems that can record certain items of vehicle-related data and transmit them to us or our service providers. This includes in particular

- Location data (GPS coordinates)
- Movement and usage data (e.g. speed, mileage, engine status)
- Condition and diagnostic data of the vehicle

Purpose of the processing:

- Fulfilment and processing of the rental agreement (e.g. recovery, invoicing, maintenance, claims processing)
- Ensuring compliance with contractual obligations (e.g. geographical use, place of return)
- Prevent of misuse and theft
- Assertion, exercise or defence of legal claims

Legal basis:

- Art. 6(1) point (b) GDPR (fulfilment of contract)
- Art. 6(1) point (f) GDPR (legitimate interest in the protection of property, prevention of misuse, processing of claims)

Recipients:

IT and telematics service providers, insurance companies, experts, authorities, manufacturers/suppliers (insofar as transmission of the data is required).

Special note:

The geolocation data relates primarily to the vehicle. As the vehicle is provided to a specific person for the rental period, however, personal identification cannot be ruled out. We therefore treat this data as personal data and process it in accordance with the provisions of the GDPR. We only process geolocation data if there are reasonable grounds for suspicion of unlawful behaviour in a specific case, e.g. to locate vehicles after misappropriation or theft.

7. Recipients or categories of recipients of personal data Your personal data will be shared with:

- Agency partners and rental network for:
 - Execution and confirmation of your rental
 - Fulfilment of our contract with you
 - Understanding how you use our services and improving them
 - Linking to your corporate and business accounts
 - Assistance with navigation or route planning
 - Customer support
 - Regulation of toll, traffic, or parking violations
 - Processing claims related to accidents and/or injuries
 - Providing roadside assistance
 - Protecting or defending the rights or well-being of us, our employees, customers, or others, including the "No Rental" list,
 - Verifying safe driver criteria

- Your employer, if necessary, for:
 - Granting corporate programme benefits
 - Understanding how you use our services and improving them
 - Checking driving licences or other official IDs
 - Verifying eligibility for account use and specific rates
 - Linking to your corporate and business accounts
 - Processing invoices, payments, and reimbursements
- Intermediaries for:
 - Execution and confirmation of your rental
 - Fulfilment of our contract with you
 - Processing payments and reimbursements
 - Arranging transport (transport service providers)
 - Customer support
 - Debt collection
 - Fraud monitoring
 - Credit risk assessment and management
 - Evaluating payment reliability and punctuality
- Credit card issuers, payment card companies, payment processors for:
 - Processing payments and reimbursements
 - Fraud monitoring
 - Debt collection
 - Credit risk assessment and management
 - Evaluating payment reliability and punctuality
- Government, regulatory, police and other law enforcement agencies for:
 - Verification of your driving licence
 - Requests from these authorities when disclosure is legally required or permitted
 - Initiating action for illegal activities, traffic violations, or breaches of terms of use
 - Situations where we believe in good faith that an emergency poses a threat to your safety or that of another person
 - Where legally required or permitted
- Parking stations or relevant companies or local authorities operating parking and toll services for:
 - If you incur parking fees, fines, or toll charges during your rental, we will share personal data where necessary for handling the respective violation or toll charge
 - Regulation of toll, traffic, or parking violations
- Emergency services for:
 - Protecting your vital interests in the event of an accident or emergency involving one of our vehicles
- Insurance companies and claims adjusters regarding any insurance products purchased with your rental for:
 - Providing and managing the insurance product you requested
 - Managing claims under the relevant insurance policy
- Wucherpennig & Krohn insurance providers for:
 - Managing claims under the Wucherpennig & Krohn insurance policy

- Wucherpennig & Krohn GmbH employees for:
 - Customer support, including handling issues, concerns, or other requests you submit to us
 - Monitoring customer communication for quality and training purposes
 - Assistance with navigation or route planning
 - Regulation of toll, traffic, or parking violations
 - Processing claims related to accidents and/or injuries
 - Providing roadside assistance
 - Supporting payment processing and invoicing
 - Assisting with vehicle damage claims
 - Handling requests for inclusion on the "No Rental" list
 - Protecting or defending the rights or well-being of us, our employees, customers, or others
 - Execution and confirmation of your rental
 - Fulfilment of our contract with you
 - Linking to your corporate and business accounts
 - Customer support
 - Investigating, detecting, and preventing fraud, theft, or other incidents related to rentals and our vehicles
 - Verifying safe driver criteria
 - Administrative, management, accounting, and reporting purposes
- Third-party contractors and service providers, including auditors, legal advisors, and debt collection agencies for:
 - Providing the services you requested
 - Managing and protecting Wucherpennig & Krohn's business and security
 - Detecting and protecting against fraud, theft, or misuse
 - Customer support
 - Collecting overdue payments

8. Transfer of personal data to a third country

No personal data is transferred to a third country

9. Data retention period

Your data will be stored at Wucherpennig & Krohn GmbH for as long as necessary to fulfil the respective purpose (contract fulfilment, legal obligations, or establishment, exercise, or defence of legal claims), considering legal retention periods.

10. Data subject rights

Under the General Data Protection Regulation, you have the following rights:

If your personal data is processed, you have the right to obtain information about the data stored about you (Article 15 GDPR).

If incorrect personal data is processed, you have the right to rectification (Article 16 GDPR).

If the legal requirements are met, you may request the deletion or restriction of processing, as well as object to processing (Articles 17, 18, and 21 GDPR).

If you have consented to data processing or if a data processing contract exists and processing is carried out using automated procedures, you may have the right to data portability (Article 20 GDPR).

If you exercise any of the above rights, the organisation will review whether the legal requirements are met.

You also have the right to lodge a complaint with the competent state data protection authority:
State Data Protection Commissioner of Schleswig-Holstein, Holstenstraße 98, 24103 Kiel, Germany

11. Obligation to provide data

You are required to provide your data. This obligation arises from the contract conclusion, for which Wucherpennig & Krohn GmbH requires your data. If you do not provide the required data, the contract cannot be concluded with you.