

Personal Data Protection

INFORMATION ON THE PROCESSING OF PERSONAL DATA

The company humlet s. r. o., with its registered office at Lermontovova 911/3, Bratislava I – Staré Mesto, 811 05, Company ID (IČO): 57 404 895, Tax ID (DIČ): 2122730863, VAT ID (IČ DPH): SK 21 22 73 08 63, registered in the Commercial Register maintained by the Municipal Court Bratislava III, Section: Sro, Insert No.: 195962/B (hereinafter the "Lessor"), in accordance with Art. 13 of 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 (hereinafter also the "General Data Protection Regulation"), provides data subjects with the following information on the processing of personal data:

The Lessor processes the personal data of data subjects in information systems (with the exception of data obtained from GPS monitoring devices, which are processed in a separate information system of the Lessor).

In which information systems do we process personal data?

The Lessor processes personal data primarily in the following information systems:

- Records of Lessees for invoicing purposes (via the accounting program superfaktura.sk, operated by SuperFaktura, s.r.o.)
- Records of agreements and reservations (in paper form and/or electronically via the Signi.com platform, operated by Digital factory, s.r.o.)
- Recovery of receivables and handling of insurance claims
- Loyalty program (if introduced)
- Contact form and customer accounts
- GPS monitoring of selected vehicles (via the Xmarton platform, operated by Xmarton Slovakia s.r.o.)
- Mobile payment terminal (via Tatra banka, a.s.)

Why does the Lessor process personal data?

The Lessor processes the personal data of data subjects for the purposes of:

pre-contractual and contractual relationships, in particular for the purposes of processing and sending price quotations, reservations, preparing and concluding agreements, and fulfilling the Lessor's contractual obligations, in particular within the framework of Rental Agreements and framework agreements related to the administration of agreements, the collection and handover of the Vehicle, complaints proceedings, invoicing, and the like. The legal basis for the processing is the performance of a contract, or the taking of steps at the request of the data subject prior to entering into a contract, pursuant to Art. 6(1)(b) of the General Data Protection Regulation. The provision of personal data by the data subject is a contractual requirement. If the personal data are not provided, it will not be possible to enter into a contractual relationship with the data subject.

the unambiguous identification of the data subject, on the basis of consent given by the data subject prior to the making of a photocopy of the data subject's official documents and/or electronically produced and recorded copies and reproductions of official documents in another manner (scanning of documents, verification of the authenticity of documents, which are stored on electronic media, and the like), provided that the Lessor, in justified cases, requests such copies of official documents from the data subject. The giving of consent is voluntary.

security, the protection of property and financial interests arising from the concluded contractual relationship and from the Lessor's legitimate interest derived therefrom under point II.5 of the T&C. For

this purpose, selected rented vehicles are secured by monitoring their location via satellite tracking (GPS) (locating rented vehicles during their use and after their theft). Personal data (arising from information obtained about the location of the Vehicle) is processed where the rented motor vehicle is used by a single natural person, i.e., where, at the time of use of the rented motor vehicle, the Lessor is able to identify a specific natural person and the Vehicle is equipped with a monitoring device. In this case, personal data will be processed to the extent of the GPS information obtained about the location of the Vehicle and the characteristics of the data subject that can be derived from it. The Lessee is informed, upon collection of the Vehicle, that the rented Vehicle is equipped with a GPS monitoring device.

the recovery of damage and receivables that have arisen, the handling of insurance claims, the retention of documentation and records made, and on the basis of the Lessor's other necessary legitimate interests.

How can personal data about another natural person be legally provided?

A Lessee who is the employer of another natural person is entitled to provide the Lessor with the personal data of that natural person even without their consent, solely in connection with the establishment of pre-contractual and contractual relationships related to the rental of the Vehicle, and only to the extent of: title, first name, surname, job position, service position, functional position, employee personal number or employee number, department, place of work, telephone number, fax number, work e-mail address, and the employer's identification data, if this is necessary in connection with the performance of the data subject's work duties, service duties, or functional duties. The provision of personal data must not compromise the dignity, standing, or safety of the data subject.

A natural person who is a Lessee is also entitled to provide the Lessor with the personal data of another natural person, even without that person's consent, but only in accordance with applicable legal regulations and contractual terms, and only where doing so protects the Lessee's own legally protected interests, for example in connection with the handling of insurance claims.

In other cases, a person who wishes to provide the Lessor with the personal data of another natural person is obliged to have that person's consent and to submit this consent to the Lessor upon request. By providing the data of another natural person, this person expressly declares that they have adequate authorization on the basis of which they are entitled to provide the personal data of that person to the Lessor.

A person who provides the Lessor with the personal data of another natural person is obliged to inform that natural person about the processing of their personal data by the Lessor, in particular by providing them with this Information on the Processing of Personal Data or by notifying them of its wording as published on the Lessor's website www.humlet.com.

What security measures do we take?

The Lessor has adopted appropriate technical and organizational measures to protect personal data. These measures include, in particular, the use of access passwords, antivirus protection, data backup, physical security of premises, and access control limited to authorized persons. The purpose of these measures is to prevent the loss, unauthorized access, or misuse of personal data.

For how long are personal data retained?

Personal data obtained from GPS monitoring of vehicles are retained for a maximum of 2 years from the end of the rental, unless it is necessary to retain them longer for the purpose of asserting legal claims.

Photocopies of official documents are retained for the duration of the contractual relationship and are destroyed no later than 3 years after its termination, unless the Lessor uses them on the basis of legitimate interests (for example, in connection with the handling of damage, insurance claims, and thefts).

Personal data processed for other purposes are retained for the period necessary to achieve the purpose of their processing, as determined by special legal regulations or as follows from the Lessor's legitimate interest. Accounting documents containing personal data are retained for a period of 10 years in accordance with the Accounting Act.

Automated Decision-Making and Profiling

In processing personal data, the Lessor does not carry out automated decision-making or profiling that would have legal effects concerning the data subject or would similarly significantly affect them.

To which recipients are personal data provided?

To supervisory authorities in the exercise of their activities under special legal regulations (e.g., the Slovak Trade Inspection), to courts and law enforcement authorities upon their request, or within the scope of the Lessor's legitimate interests, to insurance companies with which the Lessor has concluded an insurance contract relating to the rented Vehicle. To contractual processors (e.g., IT services, accounting services, legal services), who process data on behalf of the Lessor on the basis of a written agreement.

What rights does the data subject have in relation to the processing of their personal data?

The data subject has the right:

- to information about the processing of their personal data;
- to obtain access to the personal data processed and retained about them;
- to request the correction of their incorrect, inaccurate, or incomplete personal data;
- to request the erasure of their personal data when it is no longer needed, or if the processing is unlawful;
- to object to the processing of their personal data for marketing purposes or on grounds relating to their particular situation;
- to request restriction of the processing of their personal data in special cases;
- to receive their personal data in a machine-readable format and/or to request that it be transmitted to another controller;
- to withdraw their consent at any time, without affecting the lawfulness of processing based on consent given before its withdrawal, if the data subject has given such consent;
- to request that decisions based on automated processing that concern them or significantly affect them, based on their personal data, be made by natural persons and not automated technical means, if personal data are processed in this manner by the Lessor. The data subject has the right to express their point of view and to object to a decision of the Lessor;
- to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work, or the place of the alleged infringement, and the right to an effective judicial remedy, if they believe that the processing of their personal data is in breach of legal regulations. The supervisory authority in the territory of the Slovak Republic is the Office for Personal Data Protection of the Slovak Republic (www.dataprotection.gov.sk);
- to exercise their rights by means of a form available on the website or by a request sent to the Lessor.

Use of Cookies

The following cookies are used on the Lessor's website:

- Functional cookies ensure the proper functioning of the website (e.g., login, shopping cart).
- Analytical cookies are used for anonymized measurement of website traffic and the improvement of services (e.g., Google Analytics, Google Tag Manager).
- Marketing cookies are used only with the visitor's consent to personalize content and advertising (e.g., Google Ads, Meta/Facebook, Instagram, LinkedIn).

In connection with the use of analytical and marketing cookies, personal data may be transferred to a third country (the USA), through providers certified under the European Commission's adequacy decision (the EU-US Data Privacy Framework), or on the basis of standard contractual clauses approved by the European Commission, which guarantee an adequate level of protection of personal data.

You can adjust your use of cookies in your browser. Blocking technical cookies may limit the functionality of the website.

How to Exercise Your Rights?

The data subject has the right to submit a request or complaint to the Lessor in connection with the protection and processing of their personal data. Any data subject who wishes to submit a request or complaint and exercise their rights may do so in writing at the address: humlet s. r. o., with its registered office at Lermontovova 911/3, Bratislava I – Staré Mesto, 811 05, electronically at the address: www.humlet.com, or by telephone at +421 904 039 039.

GPS Monitoring of Vehicles

The Lessor may process location data obtained from GPS devices placed in vehicles. The data processed includes, in particular, the location of the Vehicle (GPS coordinates), time data on the movement of the Vehicle, speed, and information on the starting/stopping of the Vehicle, which may be attributed to the Lessee or the driver of the Vehicle. The purpose of the processing is to protect the Lessor's property, to locate the Vehicle in the event of theft, breakdown, or an insured event, to verify compliance with the contractual conditions of the vehicle rental, and to assert legal claims. The legal basis for the processing is the Lessor's legitimate interest under point II.5 of the T&C. The data are retained for a maximum of 2 years from the end of the rental, unless it is necessary to retain them longer for the purpose of asserting legal claims. The data may be made available to insurance companies, public authorities on the basis of a lawful request, providers of GPS and IT services, legal representatives, or entities engaged in debt recovery, always only to the extent necessary to achieve the purpose of the processing. The rights of data subjects are set out above in this Annex.

Valid from: 1 September 2026