

Privacy Policy

SIXT ONE

Rewards Program

Content

A:	Data controller, contact details of the data protection officer	3
B:	Categories of personal data	3
C:	The purposes of data processing	3
1.	Performance of the Rewards Program	3
2.	Marketing & Direct Advertising	4
2.1.	Consented Marketing	4
2.2.	Direct Marketing to existing customers without consent	4
3.	Rewards Status Match	4
D:	Sources of your data	5
E:	Categories of recipients of your data	5
F:	Transfer to third countries	5
G:	Duration of storage	5
H:	Automated decision-making	6
I:	Profiling	6
J:	Rights of data subjects	6
1.	Right of access by the data subject, Art. 15 GDPR	6
2.	Right to rectification, Art. 16 GDPR	6
3.	Right to erasure, Art. 17 GDPR	6
4.	Right to restriction of processing, Art. 18 GDPR	7
5.	Right to data portability, Art. 20 GDPR	7
6.	Right to object, Art. 21 GDPR	7
7.	Right to withdraw consent, Art. 7 (3) GDPR	7
8.	Contact information to exercise the rights of data subjects	7
9.	Right to lodge a complaint, Art. 77 GDPR	7
K:	United States Specific Provisions	8
1.	Notice of Loyalty Program and Financial Incentives	8
2.	Your Privacy and Data Rights	8
2.1.	General	8
2.2.	Your California privacy rights and disclosures	8

In the following we would like to inform you about the processing of your personal data by the Sixt One GmbH, Zugspitzstr. 1, D-82049 Pullach im Isartal, Germany, and the Sixt group entities mentioned in Appendix 1 to this Privacy Policy (together referred to as **"SIXT"** or **"Us"**) in connection with your use of SIXT's rewards program **"SIXT ONE"**, including the types of personal data processed, the purposes and legal bases of the processing and your rights related thereto. You are not contractually or legally obliged to provide us with your personal data, but you may not be able to participate in SIXT ONE or use all of its features, if you do not provide certain personal data.

Please note that the scope of this Privacy Policy is limited to the processing of personal data in connection with SIXT ONE. For more information on the general processing of personal data by other Sixt entities in connection with your rental, the use of our website and the Sixt App or the processing of personal data in connection with video surveillance and similar technologies, please refer to the applicable privacy policies on our websites and in the app. The relevant privacy policies are always provided to you before the processing of your personal data.

A: Data controller, contact details of the data protection officer

The controllers within the meaning of Art. 26 of the Regulation (EU) 2016/679 - General Data Protection Regulation (**"GDPR"**), i.e., the responsible parties for the processing your personal data (**"Controllers"**) are

- the Sixt One GmbH as the administrating legal entity of the rewards program and,
- the legal entities of the Sixt Group participating in the rewards program as specified in Appendix 1 (**"Participating Sixt Company"**).

Unless stated otherwise in this Privacy Policy, the above-mentioned entities are jointly responsible and act as joint controllers within the meaning of Art. 26 of the Regulation (EU) 2016/679 - General Data Protection Regulation (**"GDPR"**) for the processing of your personal data in connection with the provision of SIXT ONE. The roles and responsibilities towards you under the applicable data protection laws, including the Regulation (EU) 2016/679 (**"GDPR"**), are determined and allocated in joint controller agreements between the respective Controllers. SIXT will provide you with the essence of the arrangements upon request.

If you have any questions regarding data protection, please address your query to the following e-mail address: dataprotection@sixt.com

You can also contact our data protection officer by sending a letter via mail to the addresses stated above and in Appendix 1 (reference: Data Protection Officer).

B: Categories of personal data

We may process the following categories of personal data in connection with SIXT ONE:

- **Master Data:** first name, surname, address (private and/or business), customer number;
- **Communication Data:** e-mail address (private and/or business), (mobile) phone number;
- **Contract Data:** vehicle category, place of pick-up and return, booked extras/services, reservation and rental contract number;
- **Core Rewards Program Data:** These data are necessary to perform the core functionalities of the rewards program such as the member ID, information on the amount spend for your reservations, date and time of your reservation, applied or applicable discounts, used upgrade, status level, rewards points and free rental days earned, related information, rewards ID of partner programs,
- **Voluntary Data:** Additional data that you provide to us on a voluntary basis, without us having explicitly requested them in connection with SIXT ONE (e.g., third-party rewards status data, if you chose to match such status with SIXT ONE).

C: The purposes of data processing

1. Performance of the Rewards Program

Purposes of data processing

If you sign up for the rewards program, we process your Master Data, Communication Data, Contract Data and Core Loyalty Program Data to provide you SIXT ONE in accordance with the General Terms and Conditions and the Membership Agreement:

- Collection of rewards points based on your spend with SIXT rentals;
- Earning a rewards status based on the amount spent for SIXT rentals;
- Provision of a range of benefits such as reduced rates, complimentary upgrades, and access to a more expedited checkout process based on your rewards status;
- Exchange of accrued rewards points for a "free rental day".

Additionally, we process the mentioned data to administer for and correctly calculate the benefits granted to you between the Sixt Loyalty Clearing Entity GmbH and the Participating Sixt Companies.

Legal basis of the above processing

Art. 6 (1) sentence 1 lit. b) GDPR: The processing is necessary to offer you the rewards program SIXT ONE and to fulfil our contractual obligations in accordance with the General Terms and Conditions.

Art. 6 (1) sentence 1 lit. c) GDPR in connection with the applicable obligation under statutory tax and commercial laws: The processing is

necessary to comply with our legal accounting and tax obligations.

Recipients of your data

For the aforementioned purposes, we may disclose your data to (IT) service providers, such as cloud service providers and software providers that support us in offering Sixt ONE.

The Participating Companies may share your personal data for the above purposes with Sixt One GmbH, and vice-versa.

2. Marketing & Direct Advertising

2.1. Consented Marketing

Purposes of data processing

If you have given your express consent, we may process your master data, contract data and rewards program data for marketing efforts which include:

- Sending personalized communications about exclusive offers and campaigns (e.g., discount on vehicles based on your preferences and use history of our services) via our website, app, email or SMS.
- Sending personalized communications about partner products or services, and exclusive partner offers (e.g., offers and discounts for bookings with certain airlines or hotel chains) via our website, app, emails or SMS. The current list of our partners can be found [here](#).
- Processing your data for the purpose of market research, surveys, raffles, and contests.

To support these marketing measures, we additionally may process your above-mentioned data for analytics purposes such as the analyzing of booking patterns and rental behavior (e.g., preferred vehicle categories and protection packages) and customer segmentation, which may also include profiling (see also → Profiling).

Legal basis for the above processing

Art. 6 (1) sentence 1 lit. a) GDPR

Recipients of your data

For the aforementioned purposes, we may disclose your data to (IT) service providers, such as cloud service providers and software providers that support us in offering Sixt ONE.

The Participating Companies may share your personal data for the above purposes with Sixt One GmbH, and vice-versa.

2.2. Direct Marketing to existing customers without consent

Without your consent, we will only contact you by email for marketing purposes if we have received your email address in connection with a service provided to you, the advertising content in the email relates to similar services you have purchased in the past and you have not objected to the use of your email address for advertising purposes.

You can object to the use of your email address for advertising purposes at any time without incurring any costs other than the transmission costs for the objection according to the basic rates of your telecommunications provider by sending an email to sixtcard@sixt.com or by following the unsubscribe link in the footer of the newsletter.

Legal basis for the above processing

Art. 6 (1) sentence 1 lit. f) GDPR

Our legitimate interests in processing your personal data for the above-mentioned purposes lies in promoting similar products and services to you, provided you have not objected to this type of direct marketing.

3. Rewards Status Match

Purposes of data processing

When signing up for our rewards program, you have the option to match your status that you may have acquired in a third-party rewards program, allowing you to receive a comparable rewards status based on your existing membership level with selected partners or competitors (e.g., other car rental companies, airlines, hotels, or credit card providers), provided your current status qualifies. To verify your eligibility, we will ask you to provide proof of your existing status (membership card details or other information depending on the third-party rewards program).

For this purpose, we may process such data together with your master data to verify your status match request and award you with the comparable SIXT ONE Status.

Legal basis for the above processing

Art. 6 (1) sentence 1 lit. b) GDPR.

The processing of your personal data is necessary to fulfil your request to review your current status and – if qualified – to award you with a comparable rewards status.

Recipients of your data

For the aforementioned purposes, we may disclose your data to (IT) service providers, such as cloud service providers and software providers that support us in offering Sixt ONE.

The Participating Companies may share your personal data for the above purposes with Sixt One GmbH, and vice-versa.

D: Sources of your data

Generally, we collect your data directly from you. If you participate in SIXT ONE and the reservation was made through a third party or third party portal (e.g., travel agencies, price comparison portals or other travel intermediaries, your employer or your employers travel manager, or a road assistance service provider), the respective Participating Sixt Company executing the requested rental will receive your data from the third party and will share it with the Sixt One GmbH to ensure that you collect points for your rental.

E: Categories of recipients of your data

We engage external service providers, such as IT- and cloud service providers, and companies belonging to the SIXT group to fulfil our contractual and statutory obligations and to fulfil our legitimate interests. These service providers act as processors within the meaning of Art. 4 no. 8, and Art. 28 GDPR and we have entered into data processing agreements with these service providers.

Furthermore, your data will be exchanged between the Sixt One GmbH and the Participating Sixt Companies to provide you with Sixt ONE.

We may also transfer your personal data to public authorities (e.g. for statutory disclosure requirements to tax authorities) or lawyers, e.g. to defend and assert legal claims.

F: Transfer to third countries

Some of the recipients mentioned above may be located outside of the European Economic Area in so-called "Third Countries". The European Economic Area comprises all countries of the European Union as well as the countries of the European Free Trade Association, that include Norway, Iceland and Liechtenstein.

If there is no adequacy decision by the European Commission certifying an adequate level of protection of personal data in the Third Country, the legal and regulatory framework in such Third Country may not offer the same level of protection for your personal data as offered by the GDPR. In such case the transfer to the Third Country will only take place subject to appropriate safeguards as per Art. 46 (2) GDPR, in particular EU Standard Contractual Clauses issued by the EU Commission that provide for specific data protection related contractual obligations and safeguards. If necessary, SIXT will implement additional technical and organizational measures to ensure the safety of the personal data transferred. You can request copies of the implemented safeguards from SIXT by contacting the addresses specified above (cf. → Data controller, contact details of the data protection officer) and in Appendix 1.

In addition, some recipients of your personal data based in the USA are certified under the Data Privacy Framework ("DPF"). For such recipients, there is a restricted adequacy decision of the European Commission for certain data categories. To the extent of the valid DPF certification of the data recipient, the transfer of personal data may also be based on this limited adequacy decision.

G: Duration of storage

We store your personal data until they are no longer necessary for the purposes for which they were collected or otherwise processed (cf. → The purposes of data processing).

We may store your personal data for the establishment, exercise or defence of legal claims. For this purpose, we store your personal data in accordance with the applicable statutory limitation periods which depending on the country of your rental may vary between two and ten years.

The legal basis for this storage is Art. 6 (1) sentence 1 lit. f) GDPR: Our legitimate interest in the establishment, exercise or defence of our legal claims.

We may also store your personal data to comply with statutory retention obligations. In this case we will store your personal data for the retention period stipulated in the applicable statutory laws. Such retention obligations are provided in tax and commercial laws and may amount up to 12 years. During this period, your data will be subject to restricted use within day-to-day operations if its processing serves no further purposes.

The legal basis for this storage is Art. 6 (1) sentence 1 lit. c) GDPR in conjunction with the respective statutory regulation.

H: Automated decision-making

No automated decision-making pursuant to Art. 22 GDPR takes place in connection with the provision of SIXT ONE.

I: Profiling

We may process your data in an automated way with the aim of evaluating certain personal aspects ("profiling"). We use profiling in the following cases:

- Segmenting customers based especially on booking and rental behavior or patterns, benefits usage, and membership status to personalize communications, offers and campaigns.
- Analyzing booking history and customer behavior to suggest relevant products, services, or exclusive benefits.
- Retargeting based on gained customer insights and built marketing segments.

We will only use your personal data for profiling if you have given your consent pursuant to Art. 6 (1) sentence 1 lit. a) GDPR (see also → Consented Marketing).

J: Rights of data subjects

You can assert the rights mentioned below. Your requests to assert data protection rights and our responses to them will be stored for documentation purposes for a period of three years after the end of the year in which we responded to your request and in individual cases longer for the establishment, exercise or defence of legal claims.

Legal basis for the above processing

Art. 6 (1) sentence 1 lit. c) GDPR

The processing is necessary for SIXT to ensure compliance with Art. 12 to 22 GDPR.

Art. 6 (1) sentence 1 lit. f) GDPR

Insofar, as the processing is necessary for our legitimate interest in establishing, exercising or defending our legal claims and comply with our accountability obligations pursuant to Art. 5(2) GDPR.

1. Right of access by the data subject, Art. 15 GDPR

You have the right to obtain a confirmation from us as to whether or not we process personal data concerning you and, where that is the case, request access to information about the processing of your personal data, including information about

- the categories of your personal data processed,
- the purposes of the processing of your personal data,
- the identities of the recipients of your personal data,
- where possible, the envisaged period for which your personal data will be stored,
- the existence of the right to request a rectification or erasure of your personal data, or restriction of processing of personal data concerning you or to object to such processing,
- the right to lodge a complaint with a supervisory authority,
- where the personal data are not collected from you, information about the source of your personal data,
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR and, at in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Upon request, SIXT will provide you with a copy of the personal data processed.

2. Right to rectification, Art. 16 GDPR

You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you or to have incomplete data completed.

3. Right to erasure, Art. 17 GDPR

You furthermore have the right to obtain from SIXT the erasure of personal data concerning you. We are under obligation to erase personal data if the legal requirements under Art. 17 GDPR are met, including if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, or if you withdraw the consent on which the processing is based, provided

that there is no other legal ground for the processing.

4. Right to restriction of processing, Art. 18 GDPR

Under the legal requirements pursuant to Art. 18 GDPR, you have the right to have the processing of your personal data restricted. These include circumstances in which you contest the accuracy of your personal data and we then have to verify such accuracy. In such cases, we will refrain from further processing your personal data, with the exception of storage, until the matter has been clarified.

5. Right to data portability, Art. 20 GDPR

You have the right either to receive, in a machine-readable format, the data that you provided to us based on your consent or on a contractual agreement with us, or to have us transmit, also in a machine-readable format, such data to a third party of your choice.

6. Right to object, Art. 21 GDPR

a) Right to object in certain cases.

If the processing of your data by SIXT is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) sentence 1 lit. e) GDPR) or is based on the legitimate interests of SIXT (Art. 6 (1) sentence 1 lit. f) GDPR), then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. This also applies to any profiling based on this provision as defined by Art. 4 no. 4 GDPR, which we may use as part of our above-mentioned marketing efforts. We will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

You may exercise your right to object without the need to adhere to a particular format and direct it to:

Sixt One GmbH, Zugspitzstraße 1, DE 82049 Pullach

or to the e-mail address: sixtcard@sixt.com

b) Right to object against the processing of data for the purposes of direct marketing (as defined by section D, no. 2 of this Privacy Policy)

In individual cases, we process your personal data for direct marketing purposes. You have the right to object to your personal data being processed for the purposes of such marketing activities; this also applies to profiling to the extent that it is associated with such direct marketing.

If you object to your data being processed for direct marketing purposes, we will no longer process your personal data in this way.

You may exercise your right to object without the need to adhere to a particular format and direct it to:

Sixt One GmbH, Zugspitzstraße 1, DE 82049 Pullach

or to the e-mail address: sixtcard@sixt.com

7. Right to withdraw consent, Art. 7 (3) GDPR

If data processing at SIXT is based on your consent, then you have the right to, at any time, withdraw the consent you granted. The withdrawal of consent shall not affect the lawfulness of processing between the time consent was granted and the time it was revoked.

8. Contact information to exercise the rights of data subjects

If you wish to exercise your rights as a data subject, please direct such requests to the e-mail address: dataprotection@sixt.com.

9. Right to lodge a complaint, Art. 77 GDPR

You have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). You can exercise this right before a supervisory authority in the Member State in which you are resident, where your place of work is or the place where the suspected infringement is committed. In Bavaria, where SIXT has its headquarters, the competent supervisory authority is:

Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)
Promenade 18
D-91522 Ansbach

K: United States Specific Provisions

1. Notice of Loyalty Program and Financial Incentives

SIXT has implemented a loyalty program to reward its repeat customers. Users are given "Silver," "Gold," "Platinum," or "Diamond" status based on the number of rentals or amounts spent in a given year; we use only our rental records and do not request any additional personal information from you for participation.

To view the benefits and terms of participation in the loyalty programs and to join, please visit our website. We may adjust the terms of participation from time to time. Occasionally, discounts are offered to members, which may be tiered according to status level, and are applied automatically when the member logs in to their account and completes a transaction at check-out.

We may utilize a third-party service provider to make available "digital cards" that you can opt to load into an Apple or Google wallet. The passes contain your name, email and status level. You may elect to receive push notifications on your device to inform you of offers and other promotions associated with your SIXT status and/or use of the wallet.

You may also receive discounts if you subscribe to our newsletter with your email address.

Our collection of certain personal information about you allows us to operate the loyalty program and newsletter subscription and provide member benefits.

You may withdraw from our loyalty program by requesting to delete your account and/or you may withdraw from our newsletter subscription at any time, and you may delete the "digital card" from your applicable wallet application on your device at any time. However, we may continue to process information about you in connection with your rental transactions.

The price and service differences (including in connection with discounts and rewards) that are available to you through our loyalty program and newsletter subscription are based upon our reasonable determination of the value that we receive from collecting and retaining personal information about you in connection with operating our business. The estimated value considers a variety of factors, including, without limitation, our expenses incurred in collecting and processing the information, our expenses incurred in providing rewards to you, and the estimated marginal increase in revenue that we may derive from information related to a specific loyalty program participant. Please note that participation in the loyalty program is voluntary and customers may still rent with SIXT regardless of whether they join the loyalty program.

2. Your Privacy and Data Rights

2.1. General

This section is subject to specific disclosures on privacy rights set forth above in Section J (with respect to GDPR and laws substantially similar to GDPR) and below (with respect to CCPA and laws substantially similar to CCPA). We are committed to facilitating the exercise of your rights granted by the laws of your jurisdiction, which may include the right to request the correction, modification or deletion of your personal information and the right to opt out of the sale or sharing of your personal information (as applicable), including in the context of targeting advertising. We will do our best to honor your requests subject to any legal and contractual obligations. Subject to local law, you may have additional rights under the laws of your jurisdiction regarding your personal information, such as the right to appeal our decision regarding a data access request.

You may obtain a copy of certain personal information we maintain about you or update or correct inaccuracies in that information using the SIXT account you may establish on our website. In addition, if you believe other personal information we maintain about you is inaccurate, you may request that we correct or amend the information by contacting us as indicated in the "How to Contact Us" section of this Privacy Notice.

Section 2.2. below describes the rights of residents of California (and other jurisdictions that have adopted laws substantially similar to the California Consumer Privacy Act).

2.2. Your California privacy rights and disclosures

If you are a resident of California (or another state that has adopted laws substantially similar to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA)), you may exercise the following rights subject to certain exceptions and limitations:

The Right To Know:

- The categories of personal information (including sensitive personal information if applicable) that we have collected about you during the past 12 months.
- The categories of sources from which personal information is collected.
- The business or commercial purpose for collecting, selling or sharing personal information.
- The categories of third parties with whom we share your personal information.
- Whether we've disclosed your personal information to third parties for a business purpose, and if so, the categories of personal information we disclosed, and the categories of third parties to whom we disclosed it.

- Whether we have sold or shared your personal information, and if so, the categories of personal information we sold, and the categories of third parties to whom we sold it.
- The length of time we retain your personal information.

The Right to Access:

- You may have a right to access the personal information we have collected about you, learn how we collected this information, our purpose in collecting it and the parties your information may have been disclosed to. You may request a copy of the personal information that we have collected about you.

The Right to Correct:

- You may correct any personal information that is inaccurate.

The Right to Delete:

- You may request that we delete personal information about you that we have collected from you, which right is subject to certain requirements.

Opt-out of sales:

- To direct us not to sell your personal information to third parties for valuable consideration.

Opt-out of Sharing:

- To opt out of your data being shared for cross-context behavioral advertising.

Sensitive Information:

- To limit the use of sensitive personal information.

Nondiscrimination:

- To exercise your rights described above free from discrimination.
- These rights are subject to statutory limitations, and we may choose to deny any request, if permitted to do so by applicable law.

HOW TO EXERCISE YOUR RIGHTS

You may submit a request to exercise your rights described above to privacy-us@sixt.com. Please click Do Not Sell or Share My Personal Information at the bottom of the webpage. If you submit a data subject request, we will ask for your name, email address, phone number and your last rental agreement or reservation number. We may also require that you submit your request via the our site's standard authentication procedures (i.e., log on with user name and password to submit a request) and/or provide information about any historical transactions with us to ensure you are the person you say you are. If this information or these processes are insufficient to verify your identity and assess your privacy request, we may need to ask for additional information. You may also designate an authorized agent to make a CCPA privacy request.

PERSONAL INFORMATION THAT WE COLLECT, USE AND SHARE

The chart below summarizes the information described throughout this Privacy Policy in a manner required by California law. Under California law, some disclosures we make to vendors and business partners for consideration may qualify as "sales" from which you may opt-out.

Category	Do we collect this info?	Do we share this info with third parties for business purposes?	Do we disclose this info for valuable consideration?
Identifiers	Yes	Yes	No
Online identifiers	Yes	Yes	Yes
CA Customer Records Categories	Yes	Yes	No

Protected Classification Characteristics	Yes, but only if you volunteer it to us or if your protected classification is displayed on your driver's license (e.g., vision impaired)	Yes	No
Commercial Information	Yes	Yes	No
Internet or Network Information	Yes	Yes	Yes
Geolocation Data	Yes, from your device when you decide to grant us access to it and from the car in the event of a lost or stolen vehicle or when driven at or near international borders	No	No
Audio, electronic and visual information	Yes, in connection with recorded phone calls quality assurance and video monitoring in our locations	Yes	No
Professional or Employment Information	Yes, when your reservation is associated with a corporate account	Yes	No
Inferences	Yes	No	No

SENSITIVE INFORMATION

The California Privacy Rights Act ("CPRA") introduces "sensitive personal information" as a subcategory of personal information and it can be defined as personal information that reveals an individual's: (A) social security number, driver's license or state identification card, passport number, (B) account log-in, financial account, debit or credit card information in combination with any required security or access code, password, or credentials allowing access to an account; (C) precise geolocation; (D) racial or ethnic origin, religious or philosophical beliefs, or union membership; (E) the contents of a consumer's mail, email and text messages; and (F) genetic data. SIXT collects driver's license, state identification card, and/or passport numbers for the purposes of processing the rental transaction between SIXT and its customer and not to infer characteristics about a consumer. Sixt collects precise geo-location data from your device when you affirmatively grant us access to it to enhance our services. You may turn off your device's geo-location information at any time. Sixt also may collect geo-location information from the car in the event of a lost or stolen vehicle or when driven at or near international borders. The sensitive information we collect is used only for business purposes and not for the purposes of inferring characteristics of a consumer. Accordingly, it is not necessary for us to display a "Limit the Use of My Sensitive Personal Information" link on our Website.

General information

We reserve the right to amend and adapt this Privacy Policy with effect for the future.

Current version: September 2025

Appendix 1:

List of participating SIXT group companies:

Legal Entity	Address	Country
Sixt GmbH & Co. Autovermietung KG	Zugspitzstraße 1 82049 Pullach Germany	Germany
SIXT Rent a Car, LLC.	1501 NW 49TH St Ste 100 Fort Lauderdale, FL 33309-3723 United States of America	United States of America