

## **Data Privacy Notice**

This data privacy notice (“**Notice**”) has been written to provide a person making a report with information of how the Enterprise Mobility Ethics Hotline (“**Hotline**”) collects, uses, shares and retains information, including personal data, through use of the Hotline.

In submitting your report, you acknowledge you have read this Notice. If you do not wish for your personal data to be processed through the Hotline, you are able to report this matter directly to your supervisor, the next level of management, the Human Resources department, or your Group’s Compliance and Ethics Committee.

### **1. General**

The Hotline is a web and phone-based intake system provided by Enterprise Mobility and its affiliates to its team members, vendors, suppliers and business partners and those of its subsidiaries (“**Reporters**”) for reporting suspected violations of laws, regulations, or internal policies.

Reports submitted through the Hotline will be reviewed for compliance with the applicable reportable topics before being submitted for further review. Only a limited set of individuals are authorized to access and review such reports and each of the [operating subsidiaries](#) and Enterprise Holdings, Inc. are responsible as Data Controllers for such information. See section 6 for Data Controller information.

### **2. Use of the Hotline & Special Country-Specific Regulations**

Use of the Hotline is entirely voluntary and is only for the specific reportable categories that are available for you to choose from in the following step. You are able to make your report anonymously where specifically permitted under law; however, we encourage you to identify yourself in order for us to follow up with questions we may have.

You are encouraged to report possible violations directly to your supervisor, the next level of management, the Human Resources department, or your Group’s Compliance and Ethics Committee. If you feel that you are unable to do so, you may use the Hotline to confidentially make your report.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company’s operations may result in decisions that affect others. Therefore, we ask that you only provide

information that you believe is true. You will not be subject to retaliation for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. While the information you submit will be treated confidentially and the utmost care, there are cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. Again, we encourage you to identify yourself in order for us to follow up with questions we may have.

### **3. What personal data and information is collected and processed?**

The Hotline captures personal data and information that you provide when you make a report such as:

- (i) your name and contact details and your organization/tier (unless you are allowed to report anonymously);
- (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e., description of functions and contact details); and
- (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

### **4. Why will we process your personal data?**

Any personal data and information provided to us will be kept confidential and processed strictly for the purpose of handling and investigating your report. We will only process any personal data and information provided to us when we have a legal justification/ lawful basis to do so.

If you are based in the EU/UK, the lawful basis we rely on to process any personal data is legitimate interests (to effectively handle and investigate your report) and legal obligation (to comply with whistleblowing laws). If any sensitive personal data is processed as part of your report, we will process this data in accordance with our obligations under employment and social security and social protection law, for the establishment, exercise or defense of legal claims or on public interest grounds.

Additional information on how Enterprise Mobility processes personal data more generally can be found on the [Enterprise Mobility Privacy Center](#). If you are an employee, you can reach out to your Human Resources team for the applicable Employee Privacy Policy.

#### **4. How will the personal data and information be processed after your report and who may access personal data and information?**

In order to process and properly investigate your report (subject to the provisions of local law) the personal data and information you provide may be accessed, processed and used by the applicable Enterprise subsidiary to which the topic of the report relates. The appropriate competent personnel in Business Management, Corporate Compliance and Ethics, Internal Audit, Legal, Human Resources, or local management may be brought in as the topic of the report is relevant to these areas. These individuals may be located in the applicable country of the report and, as may be necessary, the United States and/or the United Kingdom.

Only if necessary, and in accordance with applicable laws, personal data and information you provide may also be disclosed to the local police and/or other local enforcement or regulatory authorities.

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet our legal or financial needs.

Reports accepted but not followed by litigation or disciplinary procedures will be removed or archived within two (2) months after verification; and reports accepted and followed by litigation or disciplinary procedures will be kept until end of such procedure.

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX in the United States. In certain circumstances, NAVEX may use service providers located outside the US. NAVEX, as a data processor, acts strictly on behalf and on the instructions of Enterprise Mobility and has entered into contractual commitments to protect and secure the information you provide in accordance with applicable law and to provide for an adequate level of data protection.

#### **5. Accessing information concerning the report**

Enterprise Mobility will notify any person who is the subject of a report to the Hotline except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

With some exceptions, the individual subject of the report may access information concerning the report (with the general exception of the identity of the reporter) and request correction of personal

data that is inaccurate or incomplete in accordance with applicable law. Similarly, with some exceptions, reporters may also access information about the report and request corrections of their own personal data or exercise their right to object in accordance with applicable law. To make any such corrections, please contact your applicable Data Controller as outlined in the below chart.

## 6. Contact Us

For any questions relating to this Notice or service contact the data controller as outlined below.

| Country        | Data Controller                                     | Contact Information  |
|----------------|---|--|
| United States  | Enterprise Holdings, Inc.                           | Enterprise Privacy Questions<br>600 Corporate Park Drive<br>St. Louis, MO 63105                                    |
| Canada         | Enterprise Rent-A-Car Canada Company                | Enterprise Privacy Questions<br>709 Milner Drive<br>Scarborough, Ontario M1B 6B6                                   |
| United Kingdom | Enterprise Rent-A-Car UK Limited                    | Enterprise Privacy Questions<br>Melburne Park, Vicarage Road<br>Egham Surrey TW20 9FB                              |
| Ireland        | ERAC Ireland Limited                                | Enterprise Privacy Questions<br>Unit 4 Lyncon Court<br>Snugborough Road<br>Blanchardstown Business Park, Dublin 15 |
| Germany        | Enterprise Autovermietung Deutschland B.V. & Co. KG | Enterprise Privacy Questions<br>Mergenthalerallee 42, 65760 Eschborn   |
| France         | Enterprise Holdings France S.A.S.                   | Enterprise Privacy Questions<br>37 rue du Colonel Pierre Avia 75015 Paris  |
| Spain          | Autotransporte Turistico Espanol, S.A.              | Enterprise Privacy Questions<br>Avenida del Ensanche de Vallecas 37, 28051 Madrid                                  |

## 7. Your data protection rights

If you are based in California or Canada please see your HR contact for the applicable staff privacy policy.

If you are based in the EU/UK, there are certain data protection rights available to you such as:

- **Right of access**- you have the right to request access and receive a copy of your personal data (and other supplementary information).
- **Right to rectification**- you have the right to request the rectification of your personal data if inaccurate or considered incomplete.
- **Right to erasure**- you have the right to request the erasure of your personal data.
- **Right to restrict processing**- you have the right to request the restriction/ suppression of your personal data.
- **Right to object**- you have the right to object to the processing of your personal data in certain circumstances.

If you wish to exercise any of your rights, please [Enterprise Mobility Global Privacy Portal](#). However, please note certain exemptions apply to the exercising of these rights.

## **8. Changes to this Notice**

This privacy notice may be changed by us unilaterally from time to time. Please refer often to this page for the latest information and the effective date of any changes.

**Last updated:** April 2025