



# Privacy Policy

Effective: 01 February 2025

## **1. Introduction.**

Luxcar Rental Ltd (trading as Luxcar Rental) (referred to as “Us”, “We” or “Our”), takes its obligations in relation to the Privacy Act 2020 seriously. In this Privacy Policy (Policy), “You” and “Your” means the individual providing Personal Information to Us.

This document provides You with information on how We manage your personal information provided to Us, including how we collect, hold, use and disclose personal information.

By signing the Rental Agreement, you consent Our use of GPS tracking devices or application on the Vehicle during the Rental Period, as outlined in Section 2.2 of Our Policy, and agree to the collection, use and retention of data from these devices or application as outlined in Section 2.

By using our websites, enquiring or acquiring our services, You accept this Policy and consent to the provisions of this Policy. If you have any privacy queries including how to access or update your personal information or make a complaint, please contact Us.

## **2. Collection of personal information.**

### **2.1. Types of personal information We collect.**

To deliver our services, we must collect certain personal information. Failure to provide complete or accurate information may prevent us from offering the services or could impact their quality. The personal information we collect will vary depending on the specific services provided, and may include:

1. Your name and contact details (physical address, postal address, email, phone and mobile numbers);
2. Your driver's license details when renting or driving a vehicle;
3. Flight details if the pick up location is Airport;
4. Demographic information (e.g. age, gender, occupation, interests, hobbies and other preferences if voluntarily provided);
5. Financial and credit information (e.g. account details, credit card details and expiry dates);
6. Location and details (e.g. date, time) of roadside assistance requests;
7. Information about vehicle damage and repairs (e.g. where and how the damage was incurred);
8. Insurance details in case of vehicle damage if Rental Agreement is breached;
9. Personal information from traffic or parking infringement notices sent to Us;
10. CCTV recordings from Our premises (for security and identify damage during the Rental Period);
11. Feedback, communications, and product/service inquiries;
12. Public profile information from third-party social networks;
13. Data related to how You navigate Our websites; and
14. Other personal information as required by law or voluntarily provided.

### **2.2. GPS tracking devices or application.**

We may use a GPS tracking device or application on Our Vehicles to track or locate its geographical location for safety and security reasons. The information collected may be used to:

1. Provide information to the Police or other authorities if the Vehicle is not returned at the end of the Rental Period or stolen;
2. Verify the event of an accident or incident;
3. Assist with responding to a reported breakdown;
4. Determine if the Vehicle has been used in Prohibited Areas; or
5. Other purposes permitted under the Privacy Act or any other law.

### **2.3. How We collect personal information.**

We collect personal information directly from you and from persons You have authorised to share with Us or for Us to collect from. Otherwise, We may also collection personal information:

1. When You complete a form to enquire about our services;
2. When Your interact with Us online including via our websites (by way of cookies) or other digital channels (e.g. social media);
3. If you participate in a promotion, competition or survey carried out by Us or affiliated third party;

4. From a debt collector agencies if You default in a payment to Us;
5. From third parties including the Police or other authorities responsible for managing fines for traffic violations;
6. From publicly available sources;
7. When We are required to do so by law;
8. When You navigate Our websites; or
9. When Your register to receive information on any of Our services.

### **3. Use of personal information.**

We may hold, use and disclose personal information for operational purposes, including to:

1. Create and manage Your customer account;
2. Communicate with You and conduct business;
3. Manage Your Rental Agreement (e.g. booking modification);
4. Manage documentation (e.g. customer invoices, purchase orders and electric contracts);
5. Respond to medical emergencies;
6. To provide assistance during Your Rental Period;
7. Manage fines or any traffic violations including transferring relevant data to third party administrative bodies;
8. Manage and maintain a list of clients identified with specific contractual risks, including payment disputes leading to legal action, traffic violations, recurring vehicle damage, inappropriate behaviour towards employees, and breaches of the Rental Agreement;
9. To manage vehicle repairs, replacements, or roadside assistance;
10. For product development, market research, and gathering customer feedback;
11. For marketing and promotional purposes (e.g. to keep You informed about offers, products and services);
12. To comply with Our contractual or other legal requirements; or
13. To enhance and personalize the user experience on Our website.

### **4. Marketing**

We may use and disclose Your personal information for marketing and promotional purposes to inform you of our offers, products and services. You can unsubscribe from receiving this communication by clicking on the unsubscribe link and following the prompts or by contacting Us.

### **5. Disclosing of personal information**

We respect the privacy of your personal information and will take all necessary measures to keep it confidential. However, we may share your personal information with third parties when required for the purposes outlined in Section 3 of the Policy. This may include disclosure to the following:

1. Our employees, officers, contractors, suppliers and service providers (e.g. marketing agencies, printers, roadside assistance service providers, insurance providers, website and data hosting providers, data analytics providers and other IT suppliers);
2. Our accountants, insurers, lawyers, auditors and other professional advisors;
3. Third parties that require the information to process fines or manage traffic violations;
4. Third parties that require the information for law enforcement;
5. Third parties to prevent a serious or imminent threat to public safety; and
6. As otherwise permitted or required by or under any applicable law.

### **6. Disclosing of personal information offshore**

As some of Our employees, officers, contractors, suppliers, service providers may be located offshore, please note that the privacy laws of countries outside of New Zealand may not be as comprehensive as the laws of New Zealand. We will ensure any disclosure of personal information will comply to a similar standard with the Privacy Act 2020.

### **7. How We store personal information.**

Any personal information covered by this Policy is collected and stored by Us or by suppliers or service providers we engage. This information may be stored both in New Zealand and offshore. Those working with Us understands the importance of protecting Your privacy and their role in ensuring it.

If we become aware of any breach involving your personal information, we will adhere to the requirements for reporting privacy breaches outlined in the Privacy Act 2020.

#### **8. Access to Your personal information.**

You may request access to or correction of your personal information by contacting Us.

Unless We are required to refuse by law or if the required information may relate to another individual's information, We may provide You with access to Your personal information once evidence of Your identity is verified.

If We agree to provide You access to Your personal information, We may make this condition on a reasonable charge to recover our reasonable costs of doing so.

#### **9. Changes to our Privacy Policy.**

We reserve the right to update Our Privacy Policy from time to time. You should review our Privacy Policy each time You visit our Website or when You provide Us with Personal Information.

#### **10. Contact details.**

If You require assistance with accessing your personal information or have any concerns, please contact Us via the following email: [info@luxcarrental.co.nz](mailto:info@luxcarrental.co.nz)