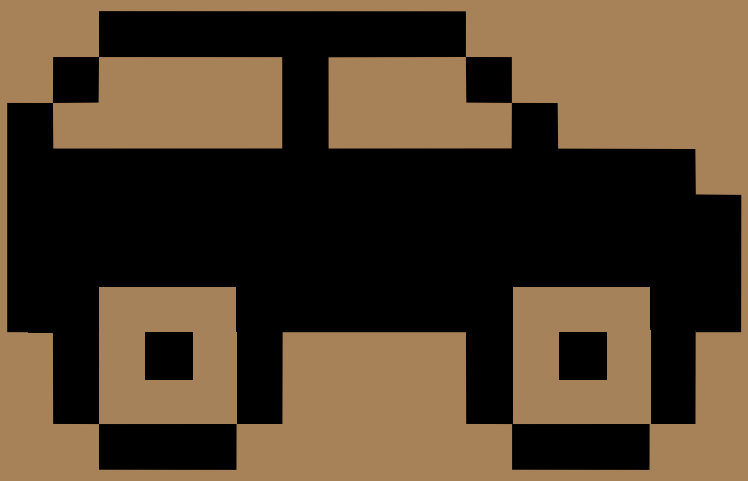
PRIVACY INTERNATIONAL

Connected Cars: What Happens To Our Data On Rental Cars?



December 2017



A Nissan Qashqai from Enterprise Rentals outside of Privacy International's office. This car had past driver located information, contact details, and more.

Credit: Privacy International

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Introduction

When you rent a car at the airport, use a car-share for a family day trip, one of the first things you are likely to do before setting off on your journey, is to connect your phone to the car. You switch on the Bluetooth and see a list of other people's phones that were previously connected - Mike's iPhone, Samsung Galaxy, Bikerboy_Troi, Dee Dee. You input your journey into the navigation, perhaps noticing stored locations of previous drivers.

Seems fairly innocuous? Wrong. Your name and navigation history is valuable personal information. The UK Metropolitan Polices' "Digital Control Strategy" identifies infotainment systems in cars, which store this information, as a new forensic opportunity. Combine this information with a bit of open source intelligence, such as social media profiles, and you can track down individuals. In fact, a car owner in Baltimore did just this when he used device names stored in the paired device list on his Jeep's Connect system to track down teenagers on Instagram who took his car for a joy ride.

The car industry is undergoing seismic change. Autonomous vehicles grab the headlines. Yet in conversations around the Internet of Things, the increasingly connected nature of transportation receives insufficient attention. The focus is on the home and work place. Yet cars, still considered private places, are the next gold rush for data miners, with a variety of different companies hungry for your data. Thus, there are a wide variety of privacy-related implications of connected cars, from those that are super connected, to those with basic infotainment systems.

> "With connectivity, cars are becoming highly efficient data harvesting machines and a major element of the evolving internet of Things. Customer data generated by the Connected Car is now seen as a major new source of revenue for automakers and their many partners…The breadth and depth of personal data that can be culled from Connected Cars is enormous and goes significantly beyond that already available via mobile devices, both in quality and in quantity."[1]

At present, car owners have little understanding or control over the data their cars generate about them, who can access this information, and how it is being used, shared, and sold to data brokers. However, missing from the debate are the implications with respect to the older car rental industry and newer car sharing schemes. While the rental companies Privacy International reached out to claimed they do not currently benefit from infotainment system data, a wide variety of companies are vying with manufacturers to capitalise on the exploitation of drivers' data. BVRLA, the trade body for the vehicle rental and leasing sector, stated in a policy update that "the industry is experiencing an

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explosion in the amount of data that is generated and processed. It is heralding a new era of technological and business convergence involving OEM's, mobile network operators, insurers, software companies and fleet operators (i.e. car rental companies). Collecting, analysing and delivering services based on this data will be a key revenue stream." Privacy International believes that people are given little information or choice on how they can safeguard their information, particularly in relation to the most basic of protections: protection from other car users, whoever they may be.

With cars increasingly asking if to download your phonebook, that have facilities for you to make and receive calls, and to message, browse the internet, and stream media, the trove of data on infotainment systems will only increase.

Our Research

We asked a number of rental companies, car-share schemes, and manufacturers about the data collected and stored on the infotainment systems when cars are returned. As we detail below, the unanimous responses were, not only is it the individual's responsibility to delete their data when they return the rental car, the individual is further responsible for informing other passengers who connect their devices to the car that their data is being stored on the car, and not necessarily deleted. We are concerned at the abrogation by both manufacturers and rental companies of responsibility as to whom is the data controller.

We don't believe these responses are sufficient. Rather than relying on the small print in terms and conditions, companies must explicitly inform customers that they should delete personal data when they return a car or at the end of a car-share. They must be given details as to how to do this effectively and informed what data may remain on the car despite a factory reset. In turn, manufacturers have a responsibility to provide drivers and rental companies with the information they need to inform customers, and to provide easy-to-use solutions to the proliferation of data on infotainment systems.

What is the infotainment system?

Infotainment and navigation systems can hold a variety of data depending on how sophisticated a vehicle's internal software and hardware. Many models include logs of previous vehicle position; mobile phone data once a phone is paired with Bluetooth, GPS navigation history, stored locations, and 'Points-Of-Interest'.

Drivers and passengers can use on-board infotainment systems for voice and data communications, on-demand entertainment, web browsing, and a growing range of applications. The data generated can reveal personal communications (voice, text, email, social networking), web browsing data, personal contacts and schedules, use of features and applications and choice of music, radio and other streamed audio or video content.[2]

Depending on the manufacturer, third party applications may be offered through the vehicle's infotainment system. In order to offer infotainment services, for example, automakers must partner with telecommunications and applications providers. Key players include telecommunications and information

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technology giants such as Verizon, AT&T, Huewei, Motorola, Siemens, Pioneer, Apple, and Google, who already have a strong position in the market for consumer data and analytics.[3]

Infotainment systems, like navigation systems, can be stand-alone or integrated with the vehicle's Controller Area Network bus in order to make use of location data or other vehicle data. Either way, infotainment systems typically involve their own operating systems to organise and manage their many functions and features. These include a dashboard interface, a system for connecting the vehicle to the internet so as to enable various private and/or public cloud-based services and applications, and voice recognition systems that allow drivers to engage in hands-free communications and operations of the infotainment system.[4]

Once 'paired' with the car's internal system, the user's phone connects with the car system every time it enters the vehicle. Calls can then be automatically transferred between the phone and the vehicle seamlessly, downloading or uploading preferences, contacts, calendar data, and other content from the phone. Voice commands can be used to make calls, play music and operate the system in other ways.

Modern cars are increasingly equipped with interior microphones and video cameras for hands-free communication as well as monitoring purposes.

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The Responses

We used car-share scheme Zipcar to rent an Audi A3 and we rented a Nissan Qashqai, the car that started the trend for mainstream small family SUVs and one of the most popular family cars in Britain. We chose to rent from Enterprise, one of the major players in car rental, and owner of Alamo and National rental companies.

We posed questions to others rental companies from whom we did not rent a car, asking whether they had a policy in relation to the infotainment system. For a full list of the questions and responses to date, please see Appendix 1. While some companies replied, others such as Sixt were less helpful and stated they were "surprised because nowhere in the email could I find a legitimate reason for such request". However, when we invited them to comment on our report they later clarified that they are working on a new policy for the customer data protection and are very committed to cover all matters as required by the new General Data Protection Regulation (GDPR). A more positive initial response came from Thrifty who stated that whilst currently they expect customers to remove data prior to returning it, they are creating a policy as part of GDPR implementation.

Enterprise, Alamo and National told us that data on the infotainment system:

> "This information is not processed by us in the course of providing the car hire services. It is the vehicle user's choice and responsibility to use and remove data via the infotainment options available in each vehicle."
>
> "When you use any satellite navigation or infotainment system in this Vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information, and you must wipe it before you return the Vehicle to us. If you do not do this, the next users of the Vehicle will be able to access this information."

They later stated:

> "This industry wide issue has been on our radar for some time. Technology has advanced so quickly, getting ahead of the automotive and transportation industries, and it takes time to catch up. There are complex dependencies between vehicle manufacturers, on-board system suppliers and vehicle rental companies. Enterprise welcomes all attempts to highlight this complexity and hopes that the Privacy International report will assist in this, ensuring that all of those involved with consumer vehicle data realise the importance of collaborating to support consumers' rights in this area."
>
> "As for the infotainment system specifically, customers would need to remove any data from the vehicle prior to its return. However, we are currently working on a customer-friendly program to educate customers about syncing phones to the rental vehicle."

Enterprise initially told us that they believe Nissan is the data controller with respect to the infotainment system.

> "The Nisaan Quashui [sic] rented was equipped with the Nissan Connect2 infotainment system. This unit was active during your rental; however, Enterprise does not have access to this and is not the controller of this data. Nissan is the data controller."

Enterprise later added that they believe they don't have access to the data, as the vehicle manufacturer determines how these units operate and collect data, whether a phone is or isn't connected to the infotainment system.

Enterprise further stated to us that:

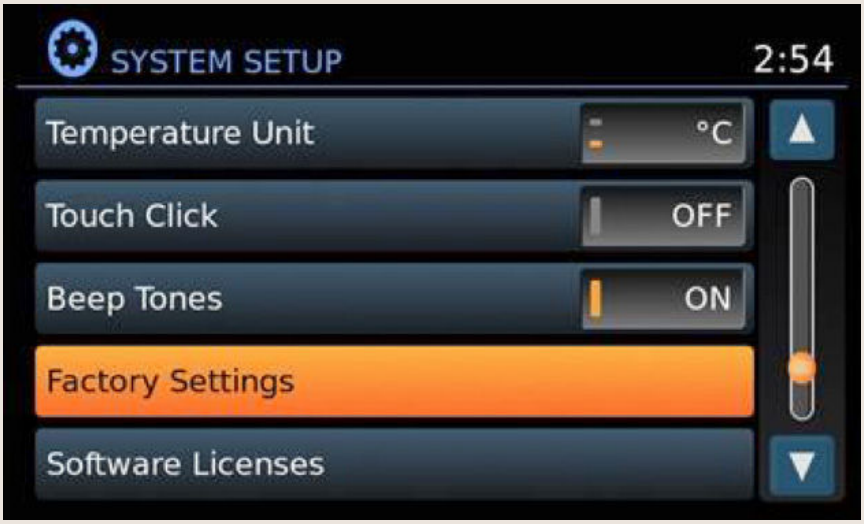
> "We recognise that this is a challenging area to define and are engaging in conversations with the manufacturers on this topic. As for the data controller, we do not make any decisions regarding these systems in terms of how they function, what data is or isn't collected and who has access to the data as we are just the vehicle provider. Also, we don't use the infotainment data either. Essentially, the product comes with the car, but we don't process any of the information."

When we asked Nissan about data on the infotainment system, they told us that it was not a connected vehicle and they couldn't access data outside the vehicle that was stored on the navigation system. Nissan further stated that the Enterprise's earlier statement that Nissan was the data controller "is a quote from Enterprise only and not a fact".

They stated in relation to data on the car that:

> "As this is a rental company fleet vehicle, Nissan does not have access to or control of a vehicle to carry out such reset after each rental customer and would expect the customer or rental company to carry out any necessary resets. Once a rental company returns a used rental vehicle to Nissan, our dealers are asked to carry out this factory reset, so any residual data would be deleted. Even if information remained on the system when a vehicle was returned to Nissan (before a further factory reset was carried out), Nissan would have no access to individual drivers' details to be able to link any telephone or satellite navigation information to a particular driver."







Nissan also said that customers should conduct a factory reset. In correspondence they included screenshots of how this is done, which requires a customer to know they should do this, how, and where to look.

Why Does This Matter?

While both the rental companies and manufacturers put the onus on individuals to delete data held on infotainment systems, there is no agreement who is the data controller of the information which resides on these devices. This is concerning, particularly as infotainment systems become increasingly sophisticated and they attract the attention of law enforcement and potentially criminals.

Manufacturers will increasingly integrate mobile apps – and infotainment services more generally – with their telematics services has implications for consumer privacy: the more data that can be associated with an identifiable individual, the greater the privacy risk and corollary responsibility of data custodians.

Last year Google introduced a new version of Android, the mobile operating system designed for smartphones and tablets. Google tweaked Android so automakers could use it to run the infotainment system in cars, as well as functions like heating and cooling, opening and closing the windows and even the instrument cluster where the drivers find the speedometer and fuel gage[5]. It was noted that this was a turning point for manufacturers who have traditionally used their own proprietary software. Android Auto is not the operating system but sits on top of it. Both Audi and Volvo have expressed interest.

Techradar reported that Apple touts over 100 vehicle models are available with its smartphone casting technology, CarPlay.[6]

While we also questioned rental companies and manufacturers about telematics units, the responses were not particularly informative. Telematics Control Units ("TCUs") control such applications as remote vehicle diagnostics, remote operations (e.g. start/stop, door lock/unlock) and alerts, automatic crash notification, emergency calling, vehicle locating and monitoring, and geo-fencing. TCUs monitor data flowing throughout the bus system; they gather, interpret, and disperse it as necessary to operate telematics functions.

Telematics Control Units include GPS receivers that calculate and provide precise vehicle location and timing information. They can be designed to store location data as necessary for delivery of the service e.g. during periods during which satellite communications are lost.

5 https://www.theverge.com/2017/5/17/15650938/android-car-google-io-2017
6 http://www.techradar.com/news/car-tech/apple-carplay-everything-you-need-to-know-about-ios-in-the-car-1230381

We were informed in responses that some cars did not have them ‘turned on’ and Enterprise stated that the telematics unit was the customers’ responsibility.

Telematics units are likely to become more and more connected to the infotainment systems in addition to gathering the above data.

> “As telematics and infotainment services merge, there is virtually no limit to the applications that will be developed to take advantage of increasingly connected car.”[7]

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Our Recommendations

If the data we generate in our cars is going to be the new gold rush then basic issues such as deletion of data on infotainment systems should already have been addressed. If we cannot be confident that companies can deal responsibly with this, then it is cause for concern when we look at the wider eco-system of data generated by telematics units and other devices within vehicles that transmit data to various parties.

1. Rental companies and car-share schemes must provide clear and explicit information to customers in relation to what data is retained on the infotainment systems and how to delete it.

2. Manufacturers must provide the equivalent of a delete button enabling customers to quickly and easily remove their personal data from infotainment systems.

Finally, we have referred our research to the UK Information Commissioners Office (ICO). We believe there needs to be clarity about data controller and data controller roles in relation to rental vehicles.

There should be clear guidance from the ICO that rental companies must provide clear instructions to rental customers (there are more than 350+ makes/models of vehicles and deleting data can be different between makes and models of vehicles)[8] how to delete their data and what procedures are in place to ensure this takes place.

8 Information provided by Enterprise Inc

Appendix 1

Our findings

1. Companies we rented / hired cars from and their response

Zipcar
This is ongoing

Europcar
We were informed to contact the franchise. This is ongoing.

Enterprise

Question	Response
1. Do you have a policy / guidance in relation to data retained on the infotainment system including location data e.g. addresses entered, and mobile phone identifiers in the Bluetooth section.	This information is not processed by us in the course of providing car hire services. It is the vehicle user's choice and responsibility to use and remove any data via the infotainment options available in each vehicle.
	Further to Right of Reply Enterprise stated: Customers would need to remove any data from the vehicle prior to its return. However, with more than 350 makes and models we are currently working on a customer- friendly program to educate consumers about synching phones to the rental vehicle.
2. You state in your 'Global Privacy Policy' dated 14 March 2016 that: *"personal information we may gather from and about our customers by means of our websites, mobile applications, online booking widgets (i.e. online booking applications run by our third-party partners such as hotel providers, airlines, etc), our corporate, rental and sales locations, and from third-party sources. By using our websites or mobile applications, you consent to the collection, use and disclosure*	The report provided contains the personal information we hold in our systems.

of your information, as described in this Privacy Policy." Please specify whether you have gathered data about me from i) websites, ii) mobile applications, iii) online booking widgets, iv) third party sources.	
3. What categories of data do you hold about me (noting the privacy policy refers to 'variety of information' and the types of data listed is not exhaustive)?	Please see the included report for all the information we have in our systems about you. This includes, your personal contact details, online reservation details, and Enterprise Plus sign-up information.
4. What is the purpose for processing my data (noting that at points the privacy policy is vague and open ended)?	1. To provide you with the services requested, your reservation and car hire, including your sign up to our Enterprise Plus program. 2. To uphold and enforce our rights as outlined in our rental terms & conditions 3. To properly protect and secure our data and property 4. To measure the quality of our services and improve or enhance our services overall 5. To provide marketing related to our products and services that may be of interest to you.
5. To whom is my data disclosed beyond Enterprise. I note the privacy policy states: *"The nature of our business and our operations may require us to share your reservation and booking information with our franchisees or licensees, which are owned and operated by independent licensees ("Licensees"). For these transactions, the Licensee is an independent data controller and maintains its own privacy policy in respect of the hire data that you provide to the Licensee. You are encouraged to check*	For your services with us, the following categories would apply: - Internally: Our parent entity, Enterprise Holdings Inc, who provides our global systems and the local branch who fulfilled your care hire. - Service providers: payment processor; website hosting, maintenance, security tools, analytics providers and other database management services, Enterprise Plus database provider, Customer satisfaction provider; Email processor For some locations in the U.S. and Canada and throughout the rest of the world we have

the privacy policy of the Licensee that is applicable to your transaction."	a network of Licensees that operate as an independent rental company. This section of the privacy policy explains that, if a customer books a car in a country where there is a Licensee, that booking information will be shared with the Licensee.
6. Are there any other sources of data in addition to those in Schedule 3[i] or listed in your privacy policy?	We do not have information other sources of data [sic]
7. What is the logic involved in automated decisions?	We have not applied any automated decisions to your transaction.
8. What data is held about me in the form of opinions?	We do not have any of this information.
9. Have you monitored my use of your website and services?	Our websites use functional and analytical cookies; we also have tools that monitor our websites for security purposes. The information provided includes information processed for these purposes.
10. How long will the information held about me be retained?	Our information retention policies vary from of 30 days to 7 years for different sets of data based on our needs to maintain the security of our systems, perform the transaction request, process your payments, to uphold the rights outlined in our transaction terms & conditions, enhance your future transactions, for analytic and statistical purposes, or as required to deal with queries or disputes. Your rental transaction is maintained in our systems for up to 7 years. Your Enterprise Plus account will be retained for as long as you continue to use your account (which may be deleted upon your request) or will automatically be removed if inactive for 7 years.
11. Was the car I rented equipped with OnStar or other vehicle telematics system[1]? Was this active during the rental period?	The Nisaan Quashqui [sic] rented was equipped with the Nissan Connect2 infotainment system. This unit was active

[1] Vehicle Operation and Location Data
EHI vehicles may be equipped with OnStar or another vehicle telematics system ('Telematics System'). Some or all Telematics System functionality may or may not be active during rental periods. Telematics Systems may provide use, disclosure of, or

	during your rental; however, Enterprise does not have access to this ~~and is not the controller of this~~ data. ~~Nissan is the data controller.~~ *[strike through indicates amendments by Enterprise further to right of reply]*
12. Do you have a policy / guidance in relation to the deletion of my personal data held on the telematics system?	Our rental terms and conditions outline that it is the customer's responsibility to remove any data left on these systems.
13. Is it likely that my personal data on the telematics unit will be disclosed to a third party[2]?	We do not disclose this information. Any such disclosures would be covered by the vehicle manufacturer's privacy policy.
14. What constitutes de-identified information[3]?	Information that cannot be directly linked to an identifiable person in absence of using other sources of data.
Follow up questions	
In relation to your response to question 5, you state that my data is disclosed to: "Service providers: payment processor; website hosting, maintenance, security tools, analytics providers and other database management services; Enterprise Plus database provider; Customer satisfaction provider; Email processor. Please could you confirm the names of the above.	Under the Data Protection Act 1998, an individual is entitled to be given a description of the recipients or classes of recipients to whom in which his/her personal data is or may be disclosed. Enterprise has already provided the information required by s.7(1) in our earlier letter.

access to (1) location information, (2) crash notification and related crash data and, (3) operational condition, mileage, diagnostic and performance reporting of vehicles ('Telematics Data'), as permitted by law.

Use of the Telematics System is subject to the terms and conditions and privacy policy posted by the applicable Telematics Systems provider and/or vehicle manufacturer (in the case of OnStar, information is available at www.onstar.com), which may include system and service limitations, warranty exclusions, limitations of liability, wireless service provider terms, privacy practices, descriptions of use and sharing of information and user responsibilities.

[2] In addition to those stated within this Policy, Telematics Data from rental vehicles may be disclosed to, accessed by or used by EHI, our affiliates, emergency service providers, others who may assist in responding to an accident, telematics service operators or those with whom we have a legal or contractual obligation to provide such data.

[3] We may also share aggregated or de-identified information about our customers with our advertising and marketing partners, and third-party media properties, including social media sites to allow them to send targeted advertising messages on our behalf.

In relation to question 1, 11 and 12 and your responses I would be grateful if you could please provide clarification in relation to the above responses by responding to the following questions: 1. Please provide a copy of your Terms and Conditions which outline that it is the customer's responsibility to remove any data left on the telematics system. 2. Please provide a copy of any policy/guidance/terms and conditions which outline that it is the vehicle user's choice and responsibility to use and remove any data via the infotainment options available in each vehicle. 3. Please provide a copy of any documentation that confirms that Nissan is the data controller in respect of the infotainment system.	1. Please see section 10 subsection f through h in the attached Rental Agreement Terms and Conditions. 2. Please see section 10g as referenced above. 3. Enterprise has inspected the vehicle in which you rented and is not able to retrieve any information directly from the infotainment system which related to you. In circumstance where a vehicle is stolen and reported to the authorities, then Enterprise would seek to access telemetry data by contacting the manufacturer for assistance with locating such vehicle. However, this is not the case in your situation and while we have attempted to contact Nissan to see if they would have access to any other information contained in the telematics or infotainment unit Nissan has not provided a response.
	10.f. The Vehicle may be equipped with a tracking device and/or a telematics system. You acknowledge that such systems utilise mobile telephone, satellite and/or radio signals to transmit data and communication and therefore privacy cannot be guaranteed. You authorise (and confirm that any Additional Drivers authorise) us and our appointed third-party service providers to use personal data for the purposes of the operation of an automatic crash notification system and the use of the Vehicle location system to investigate a potential or actual lost or stolen Vehicle (including if we are notified of this by you or someone else) and to co- operate with law enforcement authorities. You accept (and confirm that any Additional Drivers accept) that a tracking device may alert us if the Vehicle leaves the territory it was rented for or enters any designated area (such as a port) so we are aware if the Vehicle may be transferred abroad. You accept (and

	you confirm that any Additional Drivers accept) that a tracking device may alert us if there are signs of tampering or attempted or actual removal of a tracking device. Our appointed third-party service providers may use personal data collected for the purposes set out in this paragraph 10.f in order to provide us with services. We are not obliged to use or ensure the proper operation of any tracking device or telematics system in the Vehicle. **10.g.** **When you use any satellite navigation or infotainment system in this Vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information, and you must wipe it before you return the Vehicle to us. If you do not do this, the next users of the Vehicle will be able to access this information.** **10.h.** **You agree to provide the information in this paragraph 10 to any Additional Driver before you provide us with their personal data.**
	Further to Right of Reply Enterprise added: Access to any telematics on our rental vehicles is limited to situations where the vehicle is suspected of being stolen.

2. Manufacturers we contacted further to rental

Nissan GB

Question	Response
Software licenses	We are obtaining these licenses for you, but as a request for software licenses does not form part of a subject access request, these may be delivered to you outside the 40-day time limit.
Please provide a copy of your privacy policy in relation to the infotainment system and telematics system. Please clarify if there is any specific information or policies with regards to these, with respect to the car being part of the Enterprise UK rental fleet. I note that in response to question 13, Enterprise Rent-a-car state: *13. It is likely that my personal data on the telematics unit will be disclosed to a third party?* *We do not disclose this information. Any such disclosures will be covered by the vehicle manufacturer's privacy policy.*	I enclose at Appendix 1, all emails and customer services records referencing your data. Your questions were circulated by email as the questions listed and therefore your letter and accompanying details were not widely circulated. As no telephone calls were carried out with you, there were no recordings of your voice. For further reference there is no Telematics Control Unit in the Nissan Qashqai as such there is no telematics data sent or accessible. Some data may be stored within the vehicle's system but are not accessible By Nissan, such as follows: 1. Camera images are not stored 2. Previous vehicle position is not stored 3. Mobile phone data, stored locations, stored POIs are stored 4. Bluetooth data: if they are not removed, a driver may retrieve previously connected phone (at least a nickname) In the event that a driver wishes to have their data deleted, there is the option, via the Settings Menu, to carry out a factory reset at follows: System > Factory Settings > Yes As this is a rental company fleet vehicle, Nissan does not have access to or control of a vehicle to carry out such reset after each rental customer and would to carry out any necessary resets. Once a rental company returns a used rental vehicle to Nissan, our dealers are asked to carry out this factory reset, so any residual

	data would be deleted. Even if information remained on the system when a vehicle was returned to Nissan (before a further factory reset was carried out), Nissan would have no access to individual drivers' details to be able to link any telephone or satellite navigation information to a particular driver. Terms and conditions for the infotainment system are available via: https://gb.nissanconnect.eu/en-gb/CsmTerms a copy is enclosed at Appendix 2 for your reference. The vehicle does not include a telematics system and therefore there are no applicable terms and conditions. There are no policies in place with regard to the vehicle being part of Enterprise UK's rental fleet. In the event that Enterprise has installed a dongle within the vehicle, Enterprise may have access to telematics information, but Nissan has not installed such technology.
Do you have a policy/guidance in relation to data retained on the infotainment system including location data e.g. addresses entered, and mobile phone identifiers in the Bluetooth section.	Use of personal information is covered within the terms and conditions described above and set out in Appendix 2 of this letter. https://gb.nissanconnect.eu/en-gb/CsmTerms
Noting the response of Enterprise, in particular questions 1, 11 and 12: a. What categories of data do you hold about me on the telematics system? b. What categories of data do you hold about me on the infotainment system.	1. The vehicle does not include a telematics system, consequently we do not hold any vehicle usage data. User account details is covered by You+Nissan data privacy T&C. 2. The categories of data stored within a vehicle's infotainment system are listed in the terms and conditions set out in Appendix 3 and set out below: As the infotainment system is not connected, Nissan does not collect any of this data.

What is the purpose for processing my data	As there is no telematics system, no data is collected or processed. Any data collected within the vehicle is used for you to use your mobile telephone or provide route advice to read a desired destination.
To whom is my data disclosed beyond Nissan.	Data is not disclosed to any third parties.
Are there any other sources of data in addition to those listed in your privacy policy?	Our only source of data relating to you are your letters and subsequent dialogues relating to this subject access request.
What is the logic involved in automated decisions?	Nissan does not use any automated decision making algorithms.
What data is held about me in the form of opinions?	We do not do any subjective information on you.
How long will the information held about me be retained?	The terms and conditions set out in Appendix 2 set out the following: 4. 9 **Storage period.** We will retain all personal information only as long as necessary for the fulfilment of the above purposes or for a period of time necessary to comply with applicable law, any applicable statute of limitation, or the terms of this Agreement. Subject to certain exceptions, personal data will be stored for up to two years after the data has been collected unless required to fulfil contractual or other legal obligations. After such time the personal information will be deleted, blocked or made anonymous in accordance with the applicable law. Information like vehicle speed, vehicle driving direction and certain location data will be deleted or anonymized immediately after the purpose for which they have been transferred has ended but in any case not later than 24 hours after being received by the relevant data centre used by Nissan.
Do you have a policy/guidance in relation to the deletion of my personal data held on the telematics system?	The vehicle does not include a telematics system.

Is it likely that my personal data on the telematics unit will be disclosed to a third party?	The vehicle does not include a telematics system.

3. Companies we questioned and their response

Question 1
Do you have a policy/guidance in relation to data retained on the infotainment / display system in rental cars including but not limited to location data e.g. addresses entered and mobile identifiers.

Company	**Response**
Alamo & National	Policy states: 10g When you use any satellite navigation or infotainment systems in this Vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information and you must wipe it before you return the Vehicle to us if you do not do this, the next users of the Vehicle will be able to access this information. 10h You agree to provide the information in this paragraph 10 to any Additional Driver before you provide us with their personal data.
	Enterprise (owner of Alamo & National) later added: Customers would need to remove any data from the vehicle prior to its return. However, with more than 350 makes and models we are currently working on a customer- friendly program to educate consumers about synching phones to the rental vehicle.
Thrifty	Currently we would expect customers to remove any data from the vehicle prior to returning it. We are currently in the process of creating a policy as part of the GDPR implementation which we would be happy to provide in due course.
Sixt	We are currently working on a new policy for the customer Data Protection and we are very committed to cover all matters as required by the new GDPR. Our current Data Protection policy can be found in our T&Cs https://www.sixt.co.uk/t-c/
Hertz	We would like to inform you that your query will need to be handled by our Sales/Marketing Department, which can be contacted by phone, on either one of the following numbers:

Question 2
Are any or all of your rental cars equipped with vehicle telematics systems? Are these active during rental periods?

Company	**Response**
Alamo & National	Policy states: 10g When you use any satellite navigation or infotainment systems in this Vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information and you must wipe it before you return the Vehicle to us if you do not do this, the next users of the Vehicle will be able to access this information. 10h You agree to provide the information in this paragraph 10 to any Additional Driver before you provide us with their personal data.
	Enterprise (owner of Alamo & National) later added: Nearly all manufacturers have some form of telematic systems in vehicles today. These systems may actively collect data related to the vehicle's functions and performance. How each manufacturer or its third party suppliers have access to this information varies by manufacturer. Access to any telematics on our rental vehicles is limited to situations where the vehicle is suspected of being stolen**.**
Thrifty	We do not currently activate telematics on our rental vehicles.
Sixt	We are currently working on a new policy for the customer Data Protection and we are very committed to cover all matters as required by the new GDPR. Our current Data Protection policy can be found in our T&Cs https://www.sixt.co.uk/t-c/
Hertz	We would like to inform you that your query will need to be handled by our Sales/Marketing Department, which can be contacted by phone, on either one of the following numbers:

Question3

Do you have a policy/guidance in relation to data retained on the infotainment / display system in rental cars including but not limited to location data e.g. addresses entered and mobile identifiers.

Company	**Response**
Alamo & National	Policy states: 10g When you use any satellite navigation or infotainment systems in this Vehicle, you are responsible for any information that is stored in the systems as a result of your use. We cannot guarantee the privacy or confidentiality of such information and you must wipe it before you return the Vehicle to us if you do not do this, the next users of the Vehicle will be able to access this information. 10h You agree to provide the information in this paragraph 10 to any Additional Driver before you provide us with their personal data.
Thrifty	n/a As above – we do not currently activate telematics on our vehicles.
Sixt	We are currently working on a new policy for the customer Data Protection and we are very committed to cover all matters as required by the new GDPR. Our current Data Protection policy can be found in our T&Cs https://www.sixt.co.uk/t-c/
Hertz	We would like to inform you that your query will need to be handled by our Sales/Marketing Department, which can be contacted by phone, on either one of the following numbers:

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i **Schedule 3: Type of data you may hold**

I note that you may hold the following data as listed in your privacy policy:

1. Data from and about customers from Enterprise websites, mobile applications, online booking and third party sources:

"At Enterprise Holdings, Inc., through our subsidiaries operating under the Enterprise Rent-A-Car, Truck Rental, Car Sales, RideShare and CarShare, Alamo Rent A Car, National Car Rental and at Enterprise Fleet Management, Inc., (collectively, "EHI", "we", "our" or "us"), we respect your privacy. We implemented this privacy policy ("Privacy Policy") to explain to you how we use and protect the ***personal information we may gather from and about our customers by means of our websites, mobile applications, online booking widgets (i.e. online booking applications run by our third-party partners such as hotel providers, airlines, etc), our corporate, rental and sales locations, and from third-party sources****. By using our websites or mobile applications, you consent to the collection, use and disclosure of your information, as described in this Privacy Policy."*

2. From your privacy policy you collect:

   - *Your name, contact information, driving licence number and expiry date, emergency contact information and date of birth;*
   - *Vehicle rental information, including the location of where the vehicle is rented, date of rentals, type of rental and your preferences;*
   - *Your credit card details, Enterprise, Alamo or National rewards information, online user accounts details, membership/corporate ID numbers, passport information and frequent flyer or travel partner affiliations;*
   - *Information that you provide regarding your marketing preferences or in the course of participating in surveys or promotional offers;*
   - *Photographs that you submit of you and your driving licence or your receipts through the camera features available on some of our mobile applications and websites;*
   - *Financial information that may be necessary to facilitate the purchase or lease of a vehicle from a Car Sales or Fleet Management location in the United States. (Additional notices will be provided to you at the time of that transaction.)*
   - *Additional contact information about you that we may obtain through third parties with whom we do business (e.g. travel agents, Car Sales lead providers or similar providers).*

3. Location based information from my mobile or IP address:
   With your consent we may access location-based information from your mobile device or based on your IP address. We may also use your mobile device location information to provide you with notifications with your consent.

…

4. Website information (please note that I have supplied IP address for my laptop in relation to whether you collect this information about me)

Information Collected and Stored Automatically

"By visiting our websites, certain information may be automatically provided to us by your computer. For each visitor to our websites, our webservers automatically recognise the visitor's ***domain name or IP address****. An IP address is a number assigned to your computer when you connect to the Internet. As part of the protocol of the Internet, web servers can identify your computer by its IP address. In addition, we may collect* ***your browser type and operating system as well as your Internet service provider (ISP), referring and exit pages, date and time stamp and/or click stream data.*** *We collect similar information when visiting our websites with your mobile device,* ***including mobile device brand, model, mobile operation system and carrier****. Except as otherwise explained in this policy, we may combine the non-personal information that we collect from you (as described above and as described below, under 'Cookies & Pixel Tracking') with your personal information in order to tailor our websites and enhance your online experience by saving your preferences and/or to help identify site features, advertisements and offers that may be of interest to you."*

5. Cookies and Pixel Tracking

Cookies & Pixel Tracking
EHI and our partners use cookies, pixel tags, etags, HTML 5 storage and similar technologies on most of our sites and in promotional emails which we may send to you.

We use them to monitor and understand your use of our websites and services; improve your user experience and enable personalised features and content; optimise our advertisements and marketing and see which email promotions were of interest to you; and assist third-party advertising companies to serve ads on our behalf across the Internet. At this time, EHI websites do not respond to automated signals regarding tracking mechanisms, including 'do not track' instructions from your browser. However, you have other options for preventing or limiting the use of cookies and similar technologies. To learn how to manage privacy and storage settings for Flash cookies, please click here. To learn more, please see our Online Tracking and Advertising page.