

Causeway

PRIVACY POLICY

Causeway, including its rental and other rental-related businesses, business affiliates, and subsidiaries (collectively referred to as "We," "Us," and "Our"), holds great respect for the privacy rights of Our customers. We are dedicated to safeguarding your privacy and value its protection. This Privacy Policy (referred to as the "Policy") outlines Our approach to handling data as a "Controller," including your Personal Data, and also covers your associated rights. The most recent significant update to this Policy was made on June 05, 2023.

A. QUICK REFERENCE GUIDE:

1. Scope

- This policy covers the information We obtain from you in connection with Causeway's vehicle rental and other associated businesses, which identifies you as an individual.
- This policy does not cover information that cannot be used to identify you as an individual.

2. Information We collect (what & how)

- Causeway, Our advertisers, licensees, business partners, and discount sponsors may collect information from you in a multitude of ways, including, but not limited to, phone calls, customer service contacts, mobile apps, websites, and other sources.
- We collect information from customers during the process of reservation and rental transactions, such as name, address, and payment card information.
- Personal data to provide you with exceptional rental services, including, but not limited to:
 - Name, phone number, address, date of birth
 - Driver's license or other forms of identification
 - Pictures and facial scans, some of which may be considered biometric data under applicable laws
 - Employer information (number, address, contact information)
 - Credit worthiness or other background information

3. Purposes for processing

- Information you provide will be used to provide you with the services you request.
- We will use the contact information you provide to communicate with you.
- We use "cookies" and other electronic tools to collect statistical information about your use of Our websites. This information is used for research and other reasons, generally to better help Our customers by showing Us how We can improve Our websites.
- We do use personal information for Our own analytical purposes.

4. 3rd Party Disclosures

- We may provide your information to designated third-party service providers, rental discount sponsors you utilize, Our licensees, and other entities.
- We may sell or otherwise monetize your information to unrelated third parties where permitted by law.
- We may share your information for marketing purposes to those with which We have an agreement to do joint advertising, subject to your consent.

5. International Transfers

- Your information may be transferred out of your country or region of residence upon your instruction.

6. Security

- We use reasonable measures to safeguard Personal Data from theft, unauthorized use, disclosure, or modification.
- We aim to maintain appropriate physical, procedural, and electronic safeguards to protect your Personal Data.

7. Data retention

- We generally keep customer information for as long as We believe necessary for the purpose for which it was collected, or as allowed by law.

8. Access, correction & portability

- You will have access to review or update Personal Data that is collected from and about you, so you can change any information that is incorrect.
- We will try Our best to accommodate your request, but We reserve the right to impose certain restrictions and requirements.

9. Withdraw consent or complaints

- Where We use consent as a basis for processing, you can always withdraw that consent.
- If you feel that this policy has been violated, We will work with you to resolve your concerns.

10. Changes

- We may modify this Privacy Policy at any time, but changes will not apply retroactively.
- We will notify you when We make material changes by posting a note on the homepages of Our websites.

Our goal is to provide Our customers with excellent services. We do business in many countries, and We aim to comply with all privacy laws that apply to the data We collect and use. This policy is subject to compliance with local law. Where this policy provides a higher standard than local law, this policy will control how Causeway handles your Personal Data. By providing your Personal Data to Us, Our designated service providers, or other third parties as noted within this Policy, you consent to Our use and disclosure of your data for the operational and other purposes listed in this policy.

1. SCOPE & CONTROLLERS

Causeway, along with its rental business affiliates and subsidiaries, is the data controller for the purposes of this Policy. However, we also have a network of licensees worldwide that provide our services, and we are affiliated with various other companies through ownership. Since our licensees, affiliates, and third-party vendors are independent entities not owned or controlled by us, they are not covered by this policy. We cannot be held responsible for the privacy practices of our licensees and other third parties with whom you may transact.

This Policy pertains to the information collected about you in relation to our vehicle rental businesses, which can identify you as an individual ("Personal Data"). It does not apply to information that cannot reasonably identify you as an individual. For instance, aggregated anonymous data, computer operating systems, aggregated preferences, vehicle identification numbers, etc., are not considered Personal Data.

Our websites are not intended for individuals under the age of 13, and we do not knowingly collect Personal Data from such individuals.

2. DATA COLLECTION (WHAT & HOW)

We, both directly and through our service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, collect Personal Data that you provide on our websites, on third-party websites, on applications, and offline in connection with any inquiries, reservations, rentals, purchases, or services. Information collected about your use of our websites, applications, or other websites may be combined with personal or other information about you from other online or offline sources. We also collect Personal Data across all the devices you use to access websites or applications of Causeway.

Providing your Personal Data to Causeway may be required due to a legal obligation, which could be a statutory or contractual obligation. It may also be on a voluntary basis or necessary for us to enter into a contract with you, depending on the purposes for which we collect and use your Personal Data as set out in this Privacy Statement. However, if you do not provide your Personal Data to Causeway, this may result in disadvantages to you. For example, we may not be able to provide certain products or services to you. Nevertheless, unless otherwise stated, not providing your Personal Data will not result in legal consequences for you.

Please do not provide information about others unless you are authorized to do so and have obtained consent to have all information used, disclosed, and transferred in accordance with this Privacy Policy. By submitting information about others, you represent and warrant that you are authorized to do so and that you have received authorization from the person about whom you are providing the information. Furthermore, you confirm that the person has consented to have all information used, disclosed, and transferred in accordance with this Privacy Policy.

- a. **TYPES OF INFORMATION COLLECTED:** The types of information collected regarding you and your interactions with Causeway may include, but is not limited to:
- **Personal Information:** Your name, email address, phone number, residency address, date and place of birth, gender, age, passport number, driver's license or other ID or other photograph, information that may constitute biometric data such as facial scans.
 - **Technological Information:** IP address, device ID, browser type, language, operating system, mobile device identifiers, geo-location data, the state or country from which you accessed Causeway websites, the specific webpages visited, the date and time of a visit.
 - **Rental Information:** Payment card information, video of you and interaction with Causeway, membership organization number, frequent flyer number, loyalty program, organizational affiliations, employee ID number, employer name and contact information, booking location, rental or purchase location, return location, credit score and history, criminal history, background, the websites you visited immediately before and after visiting Causeway websites, the number of links and specific links you click within Causeway websites, the functions you use on Causeway websites, any reservations, updates, purchases, or other transactions through Causeway websites, the data you view or download from Causeway websites, and the number of times you view any particular advertisements, geographical areas visited, preferences and usage information, charges incurred, purchase prices and details, itinerary information, data related to claims.
 - **Sensitive Data:** Causeway, both directly and through its service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, may collect certain personal data that constitutes sensitive data in some countries, such as data about health conditions or membership of a trade union. Depending upon applicable local law, Causeway may be unable to process such sensitive data without your consent. Data about your health conditions is regarded as sensitive in many countries. If you ask Causeway to accommodate a disability, such as by provision of hand controls, or if there is an accident and Causeway needs to work with insurance and claims management companies relating to any injury you may incur, Causeway may need to process data about your health conditions. Similarly, in the EU, at least, your membership of a trade union or similar organization is regarded as sensitive, and Causeway may need to process this information if you use a CDP Number that only members of that union or organization can use. Please note that if you wish to rent with Causeway or its licensees and need to provide sensitive data, they will use that sensitive data for their operational uses as described in this Privacy Policy, subject to your consent where required under applicable law.

- b. METHODS AND SOURCES OF COLLECTION:** Causeway, both directly and through its service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, may collect your information through a variety of methods. These methods may include, but are not limited to:
- Online and Offline: Causeway websites, kiosks, mobile apps, official third-party social network pages, your computer's web browser, third-party social networks.
 - Telematics devices: Collection of information through in-vehicle or in-equipment technology or other telematic devices.
 - Communication: Calls to or from Causeway reservation, customer service, emergency roadside assistance, customer contact, or member care centers.
 - Interactions: Interaction with various licensees, affiliates, and subsidiaries, including car sales and other businesses, in-person at rental locations.
 - Transactions: Reservations made with Causeway through licensees, travel agents or brokers, online or in-person, transactions completed with Causeway, licensees, and agents, including options taken, charges incurred, and any incidents or accidents that may occur.
 - Partnerships: CDP sponsors or sponsors of promotion codes, affiliation, or special discount codes, consumer reporting agencies, and other companies that have business relationships with Causeway, such as licensees, affiliates, and business partners, including airlines, hotels, and insurance companies, claims management service providers.
- c. UTILIZATION OF COOKIES AND OTHER ELECTRONIC TOOLS:** Causeway and its service providers, business partners, discount sponsors, advertisers, and advertising servers may place, view, or use "cookies," web server logs, web beacons, pixel tags, or other electronic tools to collect statistical and other information about your use of Causeway websites and other websites. This information may include information described above in Section 2.a. Causeway and the parties with which they work, as described in this Privacy Policy, may use the information collected for the purposes described in this policy or as allowed by law, either on behalf of Causeway or third parties. This includes operational changes, research, analysis, improving visitor experience on Causeway websites, compiling aggregate and anonymous information about usage, statistics, and more. Please note that if you have deleted and disabled cookies, these uses will not be possible to the extent they are based on cookie information.
- d. WEB ADVERTISING:** Causeway, its designated service providers, or third-party advertisers or their advertising servers may place or recognize unique cookies on your computer or use other electronic tools to help display advertisements that you see on Causeway websites or other websites. Information about your visits to and activity on Causeway websites and other websites may be used, alone or in combination with other information, to display advertisements on your device screen that may be of particular interest to you. Causeway may use web beacons, pixel tags, or other technologies provided by third-party advertising companies to manage and optimize online advertising and product performance. These technologies enable Causeway to recognize user visits to their websites and learn which banner ads bring users to their websites. As the internet and other eCommerce channels continue to develop, Causeway may deploy and utilize different types of technologies to collect data regarding your visit or usage.
- e. VEHICLE MANUFACTURERS:** Please note that the rental vehicles you operate may collect personal information about you. Causeway is not responsible for these activities, and such collection (and use) is subject to the vehicle manufacturer's policies and notices.

3. PURPOSES FOR PROCESSING

a. OPERATIONS AND SERVICES: We, both directly and through our service providers, business partners, discount sponsors, licensees, and booking channel providers, may use your information to provide you with the services or products you request from Causeway.

We may use your information to communicate with you regarding any reservation you initiate or rental transaction; your membership/status in one of our membership programs; or changes to the terms or features of any of our membership programs to which you belong.

We therefore process your Personal Data for these purposes to the extent necessary to perform our contract with you or to take steps at your request prior to entering into a contract with you.

For Malaysian Residents, so that we may communicate with you, you give us your consent to call you on or send text messages to your mobile telephone/device. You also consent to our use of auto-dialers and pre-recorded messages in connection with any such telephone call or text message, including calls or texts to mobile telephone numbers. We will not charge you for such calls or texts.

Causeway may take action on the basis of your driving behavior and driving behavior data (including, but not limited to geolocation, speed, mileage, braking, and damage data) derived from in-vehicle telematics and other devices or gauges or on the basis of other criteria relevant to your rental and usage of our vehicles. Actions may include suspension or termination of your ability to continue to rent vehicles from Causeway or its affiliates. Causeway may also provide or sell this information to third parties.

b. OUR MARKETING: We, both directly and through our service providers, business partners, discount sponsors, licensees, advertisers, and booking channel providers, may use your Personal Data to provide you with marketing information, special offers, and promotions via various means including e-mail, in accordance with applicable law.

Where we have obtained your consent to send these marketing communications to you, we therefore process your Personal Data for these purposes on the basis of your consent. However, where permitted by applicable law, we may lawfully use your Personal Data to send you such marketing communications (including via email) without your consent. Where permitted by applicable law, we may also process your Personal Data for these marketing purposes where necessary for our legitimate interests, which include promoting our products and services, special offers, and promotions which may be of interest to you.

You can unsubscribe from receiving such messages at any time by contacting us at the details below under "Contact Us" as well as the unsubscribe link in each e-mail message. You can also request at any time that we do not use your Personal Data covered by this Privacy Policy to provide you with special offers and promotions by contacting us at the details below under "Contact Us". Please note that if you exercise these choices, you will continue to receive communications concerning your account and products and services you requested, and in response to any requests for information by you. Please also note that this opt-out process may take some time to complete, consistent with applicable law. Third-party rental sponsoring organizations are solely responsible for their own practices, and an unsubscribe request must be sent to any such organization from which you would like to stop receiving marketing materials.

c. THIRD-PARTY PURPOSES: As part of our Services, we have engaged with third-party organizations that sponsor the CDP, member, employee, or other number used by you to complete a rental or purchase ("Sponsoring Organization"). As a result of our relationship with these Sponsoring Organizations, we may be under an obligation to provide the third party with details about you and your use of our services as they relate to your relationship with the Sponsoring Organization.

We process your Personal Data in relation to Sponsoring Organizations to the extent necessary for performance of our contract for rental or purchase where you use a CDP, member, employee, or other number Sponsoring Organizations may have different privacy practices than we do, and we recommend you review the Sponsoring Organization's privacy policy for the purposes which they will use your information. As we do not control the Sponsoring Organization's privacy practices, they may not be the same as ours. However, because of your relationship with the Sponsoring Organization, they can use Personal Data which they receive from us for the purposes specified in their privacy policies or similar statements.

d. NORMAL COURSE OF BUSINESS: We may also process your Personal Data and other information if such processing is necessary:

- (a) to comply with the law or in response to a subpoena, court order, law enforcement request, or other legal process;
- (b) to protect the interests, rights, safety, or property of us or others;
- (c) to enforce any terms of service on our websites or the terms and conditions of any rental, purchase, or utilization;
- (d) to provide you and others with the services or products requested by you or your designated representative, and to perform other activities related to such services and products, including billing and collection;
- (e) to provide you with special offers or promotions from us that may be of interest to you, where permitted;
- (f) as part of a business transaction where all or some of our assets are bought, sold, or otherwise transferred by act of law or contract; or
- (g) to operate our systems properly.

4. DISCLOSURES TO AFFILIATES AND THIRD PARTIES:

a. THIRD-PARTY PROVIDERS: Causeway may share your personal and other information with its service providers, business partners, discount sponsors, licensees, assigns, advertisers, and booking channel providers. Causeway may share with other third parties aggregate or anonymized information about its website users, such as your use of this website or other websites, and the services provided on this website or other websites, as well as any rental, purchase, or utilization information. Causeway may provide information about you and your interactions with Causeway to any third-party organization that sponsors the CDP, member, employee, or other number used by you to complete a rental or purchase. Causeway may also share your Personal Data with a sponsor or other third party that provides you with special offers or promotions that may be of interest to you ("Third-Party Provider") where permitted. You may instruct Causeway at any time not to share your Personal Data covered by this Privacy Policy with such Third-Party Providers by contacting Causeway in the manner set forth below. Please note that (i) this opt-out process may take some time to complete, consistent with applicable law; and (ii) even after such opt-out process is completed, your personal and other information may continue to be shared with Causeway's affiliates (including affiliated websites under common ownership or control) and designated service providers.

b. SPONSORING ORGANIZATIONS: Causeway may provide personal information about you and your interactions with Causeway to those third-party organizations that sponsor the CDP, member, employee, or other number used by you to complete a rental or purchase. The use by such sponsoring third party of your information, including information regarding your interactions with Causeway, is subject to that organization's privacy policy and relationship with you. Causeway is not liable for and makes no assertions of any particular uses of information by such organizations.

c. SOCIAL MEDIA: If you participate in certain public features of Causeway's websites, apps, or social media websites/apps, please note that any information you or others voluntarily disclose through the use of such features becomes available to the public and/or other users whom you have designated. If you choose to provide access credentials to designated individuals, please be aware that any information you provide to Causeway may be visible to such individuals. Causeway is not responsible for the information that you or others choose to disclose publicly, and neither Causeway nor others' use of such information is subject to this Privacy Policy.

d. LINKS TO THIRD PARTIES: Causeway may provide links to third-party websites or may be linked to from third-party websites. Since Causeway does not control third-party sites, and Causeway is not responsible for any information you may provide while on such sites, Causeway encourages you to read the privacy policies on those websites before providing applicable third parties with your information.

e. LICENSEES: Causeway may provide your Personal Information to its licensees when it is necessary to complete a reservation or rental, to assist with a customer service issue, or to perform any other activities related to open or previous services or products which Causeway has provided to you.

f. GENERAL COURSE OF BUSINESS: Causeway may also disclose your personal and other information to unaffiliated third parties if Causeway believes in good faith that such disclosure is necessary:

- (a) to comply with the law or in response to a subpoena, court order, law enforcement request, or other legal process;
- (b) to protect the interests, rights, safety, or property of Causeway or others;
- (c) to enforce any terms of service on Causeway's websites or the terms and conditions of any rental, purchase, or utilization;
- (d) to provide you and others with the services or products requested by you or your designated representative and to perform other activities related to such services and products, including billing and collection;
- (e) to provide you with special offers or promotions from Causeway that may be of interest to you;
- (f) as part of a business transaction where all or some of Causeway's assets are bought, sold, or otherwise transferred by act of law or contract; or
- (g) to operate Causeway's systems properly.

5. COOKIES AND ONLINE ADVERTISING CHOICES

Many browsers are set to accept cookies by default. You may be able to set your browser to disable cookies or alert you when cookies are being sent. Many mobile devices allow you to disable the ability for geo-location information to be collected from your mobile device. The help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies, or disable the collection of geo-location data.

You need to set each browser, on each device you use to view websites. If you disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of Causeway's website or other websites will not function properly, and the advertising you receive when you visit Causeway's website or other websites may not be tailored to your interests. Causeway may not respond to a web browser's "do not track" signal or other mechanism that indicates a request to disable online tracking of individuals who use or visit Causeway's website.

Causeway adheres to the Self-Regulatory Principles for Online Behavioral Advertising. To "opt out" of advertising cookies placed by the Network Advertising Initiative's ("NAI") online behavioral advertising member networks, and thereby limit the tracking of your online activity and the targeted advertising you receive, please [click here](#).

Causeway's designated service providers assist them with advertisement display functions and related analytics for their website. To view information or opt out of Google Analytics for Display Advertising, please [click here](#). Note that even if you exercise choice for targeted advertising, you will still receive general online advertising. Information regarding you and any interactions with Causeway may be collected and utilized to provide you with targeted advertising on the web.

With regard to mobile apps, any app's collection and use of Personal Data that is materially different from what's described in this Policy will be supplemented by an individual Privacy Policy that will require acceptance for that specific app.

In addition to the options provided by your mobile operating systems, you may opt out of the collection of information on mobile apps as follows:

- Uninstalling the app: You can stop all collection of information by the app by uninstalling the app. You may use the standard uninstall processes as may be available as part of your mobile device or via the Mobile Application marketplace or network from which you downloaded the app.
- Opt out of interest-based advertising: See the instructions below or contact Causeway for information about how to opt out from the use of information to serve targeted advertising by advertisers and/or third-party network advertisers. Note that the effect of opting out of targeted advertising will be to prevent targeted advertising, but will not prevent you from seeing all advertisements. Information may still be collected and used for other purposes (such as research, online services analytics, or internal operations, and to enforce your opt-out preferences):
- For Apple users: iOS 7 or higher, you can change your settings in the following location: Settings > Privacy > Advertising. For iOS 6, you can change your settings in the following location: Settings > General > About > Advertising. .
- For other major mobile platforms: Open the platform account settings, select "Ads".

7. SECURITY

We employ reasonable administrative, technical, personnel, and physical measures to ensure the security of Personal Data. These measures aim to

- (a) protect Personal Data against unauthorized use, disclosure, loss, theft, or modification and
- (b) maintain the integrity of your Personal Data. To safeguard your privacy, it is essential to keep your logon IDs, passwords, Member numbers, and other credentials associated with our products, services, or websites confidential.

It is important to note that no method of transmitting or storing data is entirely secure. Despite their physical differences, various forms of communication like postal mail, telephone calls, text messages, faxes, and transmissions over the Internet or wireless networks carry inherent risks of data loss, misrouting, interception, and misuse. If you suspect that any of your accounts with us are no longer secure, please contact us immediately.

We strive to find a balance between data security and convenience. Consequently, there may be instances where we employ less secure means of communication to ensure accessibility. For instance, we may send unencrypted (i.e., instantly readable) emails or text messages, as some customers may not have access to encrypted (i.e., coded) communications. Although such messages may contain Personal Data, they could be more easily read if misrouted or intercepted. Therefore, it is advised not to include confidential information, such as credit card numbers or account passwords, in any email, text, or public posting on third-party social network pages. Remember that any public posting becomes immediately accessible. For a more secure mode of communication via the Internet, please click on the "Contact Us" link provided on any of our websites.

8. DATA RETENTION & INTEGRITY

- (a) Causeway retains personal data about its customers for as long as necessary for the purposes for which it was collected, or unless otherwise allowed by law. Information is stored and accessed in various locations, and cloud services and storage may be utilized. Servers which store information are primarily located in Malaysia and Singapore, although storage may occur in other locations as well.

9. INDIVIDAL RIGHTS - ACCESS, CORRECTION, SALE PROHIBITION & PORTABILITY

We may keep your Personal Data as necessary to fulfill the purposes for which it was collected. We may also retain this Personal Data as mandated by law or contract to meet our legal obligations and safeguard our legal rights. However, once the collection purpose is no longer valid, and there is no legal basis for us to retain your Personal Data, you have the Right to be Forgotten and can request us to delete your Personal Data. You can make this request by contacting us using the provided mechanism in the "Contact Us" section of this Policy. If we are unable to delete your Personal Data due to one of the reasons explained in this Policy, we will provide you with the rationale for being unable to fulfill your request.

To access, review, or update your Personal Data covered by this Privacy Policy, please reach out to us using the details outlined in the "Contact Us" section below. While we will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such access requests, if permitted or mandated by applicable laws. If you are a member of one of our membership or rewards programs, you can update your member profile by logging into your relevant member profile.

10. COMPLAINTS

Please contact Causeway as specified below if you have any questions, need access to your Personal Data, or otherwise need assistance. Causeway is also responsible for third-party agents that are processing such data on their behalf, unless they prove that they are not responsible for the event giving rise to the damage. Causeway is also subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to the Framework. Should you have concerns or complaints about the handling of your Personal Data being in violation of this Privacy Policy, you may contact Causeway directly via the methods described below in the "Contact Us" section. They will work to respond and resolve your complaints in an expeditious manner.

If you are unable to satisfactorily resolve your concerns with Causeway, you may contact the FTC with your concerns.

If you are a Malaysia or Singapore resident and you have an unresolved concern about Personal Data that Causeway or the FTC have not addressed satisfactorily, Causeway has committed to cooperating with the panel established by the Data Protection Authorities to serve as their independent dispute resolution body for the Framework.

11. Contact Us

Everyone has ability to submit their request using he online webform [here](#).

Causeway Mobility Solutions
Sdn. Bhd.
03A-01-03A,
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We do business in many countries and aim to comply with the privacy laws applicable to the Personal Data we collect and use.