

# Privacy Policy

## 1. What kind of personal data do we collect through this website?

- First Name
- Last Name
- E-mail Address
- Phone Number
- Country of Residence
- Date of Birth

## 2. Who processes your personal data collected through this website?

KGS.Co.ltd. (hereinafter referred to as the "COMPANY") is responsible for the processing of your personal data (i.e. any information that would allow to identify you, either directly or indirectly) collected through this website.

## 3. For what purposes does the COMPANY collect your personal data?

The COMPANY processes personal data that you voluntarily provide to the COMPANY through this website for the following purposes.

Your booking and your car rental agreement:

to confirm and guarantee your booking

to modify or cancel your booking

to exchange with you in relation to your booking / rental (e.g. to provide you with information on your booking / rental, to send you reminder notice before your check-in / check-out, to respond to your questions or suggestions);

to manage your rental (delivery and return of the vehicle)

to manage your invoices

to manage the payment of arrears

to manage potential claims

to manage the recovery of potential damages to the COMPANY vehicle

to manage your insurance.

This processing is necessary for the booking and the performance of the rental agreement concluded with the COMPANY.

Your payment for the COMPANY products / services.

This processing is necessary for the performance of the rental agreement. For your full information, the COMPANY can only retain your credit card information, subject to your express consent in order to facilitate future payments.

The improvement of the COMPANY products / services on the basis of customer surveys you have completed.

This processing, aiming at having a better understanding of the COMPANY members' customers' needs and offering you customized functions to enhance your experience of the COMPANY products / services, is based on the COMPANY's "legitimate interest".

Promotional and marketing activities, namely:

the sending of email and SMS notifications for special promotions / deals;

the recording of your rental history to suggest you preferred products / services when looking for new booking / rentals

the recording of your rental history to send you special offers and make you benefiting from special advantages depending on your volume and frequency of your orders;

the sending of emails about a booking you did not complete or send you a summary about a booking enquiry;

the management and update the COMPANY's customers / prospects database

Direct marketing processing activities, i.e. any commercial message from the COMPANY aiming at promoting the COMPANY products / services, are subject to your express consent.

By exception, if you are already the COMPANY's existing customer and that the message concerns products / services similar to those you have already purchased, the underlying processing aiming at promoting these products / services will not be based on your consent but on the COMPANY's "legitimate interest".

The management of fines, in particular

to satisfy fines collection procedure to which the COMPANY may be subject.

For your full information, the COMPANY carries out certain processing of your personal information through "cookies" and other tracers collected every time you visit the COMPANY website. These processing are governed by the COMPANY Cookies Policy, which we encourage you to review. You can accept or reject these cookies and other tracers by following the instructions provided in the COMPANY Cookies Policy.

## 4. For what period will the COMPANY retain your personal data?

Your personal data are retained for different period, depending on the purposes of the processing.

Your booking and your car rental

For the duration of the commercial relationship.

However, information that may evidence a right or a rental agreement, or that must kept in compliance with a legal requirement, may be subject to an intermediate archiving policy for a period of time that does not exceed the time that is necessary for the purposes for which it is kept, in accordance with applicable legal provisions.

Information specified in Article 1 will be retained for the period of 7 years.

Payment – Payment card information

Upon effective completion of the payment.

However, payment card information (excluding the visual cryptogram):

that may evidence a payment (i.e. card number and date of validity) is subject to an intermediate archiving policy for a period of time of 13 months after the effective payment for a credit card and 15 months for a deferred debit card, to be used only if the transaction is disputed; can be retained for a longer period, subject to your express consent to facilitate future payments. In any case, when the payment card is expired, related information will be deleted.

Promotional and marketing activities

For the COMPANY customers, 3 years as from the end of the relationship with the COMPANY.

For prospects – who are not the COMPANY customers – 3 years as from the collection of your personal information OR as from the last request for information you made.

## 5. What rights can you exercise with respect to the processing of your personal data?

As per EU regulation no.2016/679, you can also benefit from the following rights:

right of "access": right to obtain confirmation as to whether or not your personal data are being processed by the COMPANY, and, where that is the case, to access to these personal data and to obtain further information on the characteristics of our processing;

right "to rectification": right to obtain the rectification of inaccurate personal data or the right to have incomplete personal data completed, including by means of providing a supplementary statement;

right to "erasure" (or the so-called "right to be forgotten"): right to obtain the deletion of your personal data in certain circumstances;

right to "object": at any time, a right to object to the processing of your personal data to prevent the COMPANY from continuing to carry out such processing:

where your data are processed for direct marketing purposes;

where your personal data are processed on the basis of the COMPANY's legitimate interest. In that case, your request will be satisfied only if you provide the COMPANY with a description of the particular situation legitimating your request and save if the COMPANY can demonstrate overriding legitimate grounds in light of your particular situation.

right to "withdraw your consent": where the processing of your personal data is based on your consent, a right to withdraw your consent to the processing of your personal data at any time and to prevent the COMPANY from continuing to carry out such processing;

right to "data portability": where the processing of your personal data is based on your consent and carried out by automated means, the right to receive your personal data provided to the COMPANY, in an Excel spreadsheet and to transmit those data to a designated third party

right of a "deceased person": right to define guidelines regarding the processing of your personal information after your death.

If you wish to exercise any of these rights, please contact [Contact Us] as set out below in section 6. To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making corrections

As per article 77 of the EU regulation no. 2016/679, you can lodge a complaint about the processing of your personal data with the body regulating data protection in your country if you consider that the processing of your personal data infringes the said EU regulation no. 2016/679.

## 6. Who to contact when you have a query regarding the processing of your personal data?

Depending on the purpose of your query, you will find below

For general query regarding the processing of personal data carried out by the COMPANY: 7-3-14 Kita51-johigashi Higashi-ku, Sapporo-shi, Hokkaido

For legal notifications: 7-3-14 Kita51-johigashi Higashi-ku, Sapporo-shi, Hokkaido

## 7. How does the COMPANY protect your personal data?

The COMPANY is committed to protecting the information it collects through this website.

In particular, the COMPANY uses appropriate physical, technical and organizational security measures to prevent unauthorized or unlawful processing, accidental loss of or destruction of or damage to your personal data.

The COMPANY systems are configured with data encryption, or scrambling technologies, and industry-standard firewalls. When you send personal information to a the COMPANY website over the Internet, your data is protected by "Transport Layer Security" (TLS) technology to ensure safe transmission.

Any credit card transaction you make through the COMPANY websites is done through our Secure Server Technology. This technology notably:

assures your browser that your data is being sent to the correct computer server, and that the server is secure;

encodes the data, so that it cannot be read by anyone other than the secure server;

checks the data being transferred to ensure it has not been altered.

## 8. What rules apply to the processing of your personal data when clicking on links placed on the COMPANY website directing to the COMPANY partner's websites or other websites?

You may find various links to the COMPANY's partners websites or other third-party websites (e.g. for travel services) on this website. The COMPANY would like to draw your attention to the fact that this privacy policy does not apply to the processing of your personal data carried out by our partners or other third parties when visiting their respective websites and that the COMPANY is not responsible for these kinds of processing. We encourage you to review the privacy policies of the COMPANY's partners and other third parties to further understand the rules applicable to the processing of your personal data carried out by the same.

## 10.Changes to this Privacy Policy

This privacy policy was published on [May 2023]. In case of changes to this privacy policy implemented by the COMPANY, such changes will be identified by the COMPANY on this webpage.