

PART 3: DATA COLLECTION & PRIVACY DISCLOSURES

22. INFORMATION WE COLLECT

In order to verify Your eligibility, process Your agreement, and maintain legal and regulatory compliance, the Company collects and processes the following categories of personal information:

Data Category	Specific Data Points	Purpose
Identity Verification	Full legal name, date of birth, photograph, government-issued photo ID (driver's license, passport, state ID)	Verify identity, confirm age eligibility, prevent fraud, comply with state rental regulations
Contact Information	Email address, phone number(s), mailing address, emergency contact information	Account communications, payment receipts, service alerts, emergency notification
Driver's License Data	License number, issuing state, expiration date, license class, restrictions, driving record (via MVR check)	Verify valid driving privileges, assess eligibility, confirm vehicle class authorization
Insurance Information	Insurance carrier name, policy number, coverage types, coverage limits, policy effective/expiration dates, named insured parties, insurance agent contact information	Verify full coverage, confirm Company is listed as additional insured/loss payee, process claims
Financial Information	Credit/debit card number (tokenized), billing address, bank account information (for ACH)	Process payments
Employment & Income	Employer name, employment status, proof of income documentation (for RTO applicants)	Assess financial capability for RTO agreements, income verification
Vehicle Usage Data	GPS location data, mileage, speed, driving behavior metrics, diagnostic trouble codes, fuel levels	Mileage tracking, vehicle recovery, maintenance scheduling, safety compliance, insurance claims support, agreement enforcement
Transaction History	Payment dates and amounts, rental history, service requests, communications log	Account management, dispute resolution, audit trail, regulatory compliance

23. WHY WE COLLECT THIS INFORMATION

Each category of data we collect serves one or more of the following lawful purposes:

- **Contract Performance:** To process Your application, execute and manage Your agreement, process payments, coordinate maintenance, and facilitate the purchase option.
- **Legal Compliance:** To comply with state motor vehicle rental regulations, insurance requirements, financial reporting obligations, tax regulations, and law enforcement requests pursuant to valid legal process.

- **Legitimate Business Interest:** To prevent fraud, protect our assets, verify identity and insurance, monitor vehicle condition, manage our fleet, enforce agreement terms, and improve our services.
- **Consent:** For marketing communications and any data use not covered by the above purposes, we will obtain Your explicit opt-in consent.

24. DATA RETENTION

We retain Your personal information for the following periods:

Data Category	Retention Period	Rationale
Active Account Data	Duration of agreement plus 3 years	Post-contract dispute resolution and statute of limitations
Identity & Driver's License	Duration of agreement plus 5 years	Regulatory compliance and audit requirements
Insurance Records	Duration of agreement plus 5 years	Claims processing window and litigation hold requirements
Financial/Payment Data	Duration of agreement plus 7 years	Tax reporting and financial audit compliance
GPS/Telematics Data	90 days rolling retention during agreement; deleted within 30 days of agreement end	Operational use only; limited retention to protect privacy
Anonymized/Aggregated Data	Indefinitely	Business analytics (cannot be traced to individuals)

Upon expiration of the applicable retention period, data is securely destroyed using industry-standard methods.

25. WHO CAN ACCESS YOUR INFORMATION

25.1 Internal Access

Within the Company, access to Your personal information is restricted on a need-to-know basis to:

- Account management and customer service personnel
- Underwriting and risk assessment team
- Fleet operations and maintenance team
- Legal and compliance team
- Executive management (aggregated, de-identified data only)

25.2 Third-Party Service Providers

We share Your information with the following categories of service providers, each bound by contractual data protection obligations:

Provider Category	Data Shared	Purpose
Payment Processors	Tokenized payment data, billing address	Secure payment processing
Insurance Verification Services	Insurance policy details	Coverage verification
Motor Vehicle Records Providers	Name, license number, date of birth	Driving record verification
GPS/Telematics Providers	Vehicle location and diagnostic data	Fleet tracking and monitoring
Cloud Storage & IT Infrastructure	All data categories (encrypted)	Secure data hosting
Communication Platforms	Contact information	Service communications
Vehicle Recovery Agents	Vehicle location, customer contact info	Recovery of vehicles in default

25.3 Legal & Regulatory Disclosures

We may disclose Your information without Your consent when required by:

- Court orders, subpoenas, or valid legal process
- Law enforcement requests in connection with criminal investigations
- State motor vehicle or insurance regulatory agencies
- Tax authorities
- In connection with a merger, acquisition, or sale of Company assets (with notice to You)

26. YOUR DATA RIGHTS

You have the following rights regarding Your personal information, subject to applicable law and contractual obligations:

26.1 Right to Access

You may request a copy of all personal information the Company holds about You. We will provide the information in a commonly used electronic format within 45 calendar days of a verified request.

26.2 Right to Correction

You may request correction of any inaccurate or incomplete personal information. We will process corrections within 10 business days.

26.3 Right to Deletion

You may request deletion of Your personal information, subject to the following limitations:

- We cannot delete data required for an active agreement of any type
- We cannot delete data subject to legal retention requirements
- We cannot delete data subject to an active legal hold or pending dispute
- GPS and telematics data associated with active agreements cannot be deleted until the agreement ends

For data that is eligible for deletion, we will process the request within 15 business days and provide confirmation.

26.4 Right to Opt Out

You may opt out of marketing communications at any time by contacting us at anewimagerentals@gmail.com. We do not sell personal information.

26.5 How to Submit a Data Request

To exercise any of Your data rights, submit a request by emailing anewimagerentals@gmail.com with the subject line "Data Privacy Request." All requests require identity verification. We will acknowledge receipt within 5 business days.

27. DATA SECURITY

The Company employs industry-standard security measures to protect Your personal information, including encryption of data in transit and at rest, access controls, and regular security assessments.

In the event of a data breach that compromises Your personal information, we will notify You and applicable regulatory authorities within the timeframes required by law.

28. STATE-SPECIFIC PRIVACY RIGHTS

Depending on Your state of residence, You may have additional rights under state consumer privacy laws, including but not limited to the California Consumer Privacy Act (CCPA/CPRA), Virginia Consumer Data Protection Act (VCDPA), and Colorado Privacy Act (CPA). Contact anewimagerentals@gmail.com for state-specific information.