



General Privacy Policy

(Effective May 25, 2018)

Wheels in Europe, LLC (“WIE,” “we,” “us” and “our”) respects your privacy and we want you to understand the ways in which we collect and use information about you, whether you visit to browse our website (the “Site”), purchase one of our vehicles or services, or simply register for our Newsletter. Please review our Privacy Policy carefully. You are agreeing to its terms by visiting or using our website. Notice of all changes that materially affect ways in which your personally identifiable information may be used or shared will be posted regularly as updates to our Privacy Policy. If you continue to use the Site after notice of changes have been sent to you or published on our site, you hereby provide your consent to the changed practices.

Collection, Use, and Accessing of Information

Information Collection

Whether you make a purchase, register for an account or a service, or are just a visitor, we are very careful with what we do with your information. Collection of information is usually grouped into two categories: personally identifiable, which is information identifiable to a specific user, and non- personally identifiable, such as general demographic information (gender, age, zip code), as well as Site- wide usage information (car models, pick up and drop off location popularity, pages visited, promotion participation levels) that does not identify any one individual.

We collect non-personally identifiable information when it is affirmatively provided or through online activity such as “cookies” and other tracking technologies, which are discussed in greater detail below. We may use non-personally identifiable information for any purpose or disclose it to anyone. Where the two categories of information are combined, the resulting information is treated as personally identifiable information in accordance with the terms of this Privacy Policy.

In most cases, you can view the Site without telling us who you are or revealing any personally identifiable information. However, if you wish to make a Renault Eurodrive reservation, or a reservation for any other service we make available on our website, you will have to provide information we require of any traveler. This includes your name, a valid address, an email address, passport details and some other information regarding your trip. Further, you must provide us with your valid payment information, including credit card numbers and expiration dates (all such foregoing information, collectively, “Data”).

WIE, as the distributor of the Renault Eurodrive Program and, as may be the case, other services, collects your Data on behalf of Renault and of those service providers as well. This collection and disclosure of your Data is a required part of your transaction, and, by engaging in such transaction on the Site, you do agree to such collection and disclosure.

Apart from purchases and registration, we may also collect personally identifiable information when you choose to participate in sweepstakes or other promotions, fill out surveys, complete polls, or send questions or comments to us via email. Please read below for more information on how we use information collected through these means.

Use of Data for Transactional and Promotional Purposes

We and the service providers who assist us in connection with our Site operations may retain and use Data and other personally identifiable information, as well as non-personally identifiable information, in providing the Site services to you. Such uses may include, without limitation, what is required to:

- Facilitate your selection and reservation of a Renault Eurodrive vehicle and or any other travel products and services that we distribute;
- Complete your purchase transactions by disclosing your Data to our Suppliers
- Administer such purchases and provide reminders and follow-up information regarding your purchases and travel plans;
- Send you by email or mail, newsletters about our services;
- Allow your participation in the various promotional programs, including sweepstakes and contests, that we may offer from time to time;
- Inform you of other types of services we or our Suppliers offer in addition to Renault Eurodrive;
- Respond to your inquiries or requests, including your customer service needs;
- Improve our Site, including after research and analysis, for future marketing and/or promotional use about us or the products, services and features we may offer;
- Survey visitors about various topics, including their views on travel, destination preferences, what further travel information we might provide; and, in general, for any other purpose disclosed to you, at the time you are asked to submit your personally identifiable information.

Information Uses Involving Third Parties

As noted above, WIE is a distributor of various Suppliers' products and services, and, as a part of a transaction, Supplier(s) may need to have access to the names, age group or other information pertaining to each traveler for whom products or services are purchased from that Supplier(s). We do not provide this information to our Suppliers for their direct marketing purposes, and to the best of our knowledge and belief, our Suppliers do not use the personal information we provide to them for reasons other than completing your travel related transaction and receive feedback from you on the products or services delivered to you.

If you enter our Site from the site of one of our marketing or referral partners, our system may recognize the path you have taken. Once you have left a partner's site and/or begin a purchase transaction on our Site, those partners do not have access to the personal information you provide. Such information is treated as Data in accordance with this Privacy Policy. We also may track the path you have taken, combined with what purchases you may make, to gauge the success of our online marketing and promotional campaigns.

You may have an opportunity to provide information directly to these partners, whether through the Site or on a partner's web site, or to third parties who merely maintain links on the Site. These third parties may maintain separate privacy policies governing the collection, use and disclosure of your personal information, which you should review for more information. Once you leave our Site to go to another site,

the use of any information you provide will be governed by the privacy policy of that site's operator. We, nor our affiliate companies or subsidiaries, are not responsible for the collection, use and disclosure practices of third parties.

As noted, from time to time, we may survey you for your opinion, offer participation in sweepstakes, and conduct reviews to enhance our Site. We also send you newsletters to which you have subscribed. For each of these, we may rely on service providers to help us collect and analyze research, administer the sweepstakes, and provide technical support in sending the newsletters and other, similar emails. We do not disclose any Data included in this information for such providers' direct marketing purposes, nor so they may pass it on to others for the same reasons.

Information Use for Site Operations, Corporate and Legal Compliance

We may use or disclose your personally identifiable information as is permitted by this Privacy Policy, or according to our General Terms & Conditions. That includes:

- Performing standard business operations, such transaction, payment processing, billing, collections, and accounting;
- Protecting our and our content providers' business interests, including ensuring Site operation and adherence to our General Terms & Conditions and Usage Rules;
- Investigating or helping to prevent unlawful activity or activity that may threaten our visitors, users, employees, or property; and,
- In cooperating with law-enforcement investigations, or as required by law or by, subpoena, warrant, or other order of the court or governmental agency;

To help us perform these functions, we may retain third parties to whom we disclose personal information. These third parties include our customer-service providers, who handle your inquiries and store your Data; credit-card, debit-card and similar transaction processors; technical-service providers or similar entities that maintain the Site operations; attorneys; accountants; auditors; and authorized government entities or other lawfully authorized parties. We may also disclose your personal and other information to our affiliate companies or subsidiaries; content providers; and to third parties in conjunction with the reorganization or sale of our stock or assets, or if we are involved in bankruptcy proceedings. We will do so only after taking steps to ensure that your privacy rights continue to be protected. Any third party to which we transfer or sell our assets will have the right to continue to use the personal and other information that you provide to us.

Online Technology and Security

Cookie Use, Tracking Technologies and Digital Software

A cookie is a small text file that is transferred to an individual's hard drive for record-keeping purposes. Most browsers allow you to control cookies, including whether to accept them and how to remove them. You can set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. However, please be aware that some features of our Site may not function properly or may be slower if you refuse cookies.

Our cookies are typically session-oriented, or we use them to store information you have placed in an order form when you visit our site for a certain period of time. We also may use cookies to see what pages

have been accessed and how frequently. Our tracking technologies also may record information such as Internet domain and host names; Internet protocol (IP) addresses; click stream patterns; and dates and times that our Site is accessed.

You may occasionally get cookies from third parties with links on our Site or by third parties that serve advertisements or provide other services to our users. We do not control these cookies. We do not link the information we store in cookies to any personal information you submit.

Security for Personal Information

Wherever your Data may be held by us or on our behalf, we take reasonable and appropriate steps to protect it from unauthorized access or disclosure. This data is stored behind a “firewall” (a combination of computer hardware and software that helps keep unauthorized visitors from accessing information within our computer network), and your financial information, such as your credit card number, is encrypted. Unfortunately, no database or data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction or inadvertent disclosure of your personal information.

Managing your Data

We rely on you to update and correct your personal information. If you need to update your Data for a forthcoming trip, please contact us at 1-888-532-1221 or email us at sales@renaultusa.com indicating clearly your reservation or contract number. If you have completed travel you most likely need not update your Data unless and until you enter into a new purchase transaction with us.

If required by Law, we will grant you reasonable access to the personal information we have about you. You may also request the deletion of this personal information from our system. Please note however, that such deletion will only be possible when this information is no longer needed for the provision of our services, our compliance with our legal obligations, our ability to resolve disputes and / or the enforcement of our agreements.

We do, with your approval, use your email address to send you regular information about our products and services (on-going promotions, newsletters etc....). Please note that such communication with you is based on the opt-in principle and that you may, at any time, decide to unsubscribe from our email list. On order to do so, just follow the link provided to this effect in the document you have received or contact us as indicated below.

Contacting Us

If you have any comments or questions regarding our Privacy Policy or wish to request a change or other action pertaining to your data, please contact us at sales@renaultusa.com or at the address below.

Wheels in Europe, LLC, 45 Knollwood Road, Suite 405, Elmsford, NY 10523

Tel: 1 - 914 - 510 - 2010

Fax: 1 - 914 - 220 - 3813