

Platform Privacy Notice

Meili Travel Technology Limited

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Meili Travel Technology Limited provides technology services that power access to car rental services through partner websites and applications.

Meili acts as a data processor. We handle personal data only on the documented instructions of our partner data controllers and not for our own purposes. Your primary data protection relationship is with the car rental provider or platform through which you booked.

1. Introduction and Scope

Meili Travel Technology Limited ("Meili", "we", "us", "our") is a technology provider whose services power access to car rental services through partner websites and applications.

This Privacy Notice explains how personal data is processed when you use services powered by the Meili platform, for example, when making a car rental booking through a partner website or application that uses Meili's technology. It applies globally and reflects our commitment to consistent, high data protection standards wherever you are located. Where local law provides greater protection than the EU GDPR, Meili applies those higher standards.

Meili acts solely as a data processor in connection with these services. This means we handle your personal data only on the instructions of the relevant data controller (typically the car rental provider or the partner platform through which you are booking). For information about how the data controller uses your personal data, please refer to their privacy notice.

Meili complies with applicable data protection laws including the EU General Data Protection Regulation (EU GDPR) 2016/679, the UK GDPR and Data Protection Act 2018, and other applicable national or regional data protection laws. Where the California Consumer Privacy Act as amended by the CPRA (CCPA/CPRA) applies to the processing of your personal data, Section 9.3 sets out your rights in that context.

2. Our Role: Data Processor

When you use services powered by the Meili platform, Meili acts solely as a data processor. This means:

- We process your personal data only on the documented instructions of the relevant data controller
- We do not independently determine why or how your personal data is used
- We do not use your personal data for our own commercial, marketing, or analytical purposes
- We do not sell your personal data or share it for cross-context behavioural advertising

Who is the data controller?	The data controller is the organisation responsible for determining how and why your personal data is processed, typically the car rental provider and/or the partner website or application through which you are booking. Their privacy notice will explain their own use of your data and how to exercise your rights with them directly.
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Meili processes your personal data only on the instruction of the relevant data controller and in accordance with the applicable data processing agreement between Meili and that controller. Any sharing of your personal data by Meili is carried out in accordance with the data controller's instructions and strictly on their documented instruction. Meili will not share your personal data beyond what is required to fulfil the services or comply with a legal obligation.

2.1 Meili's Obligations as Processor

As a data processor, Meili is bound by the following obligations under Article 28 EU GDPR and equivalent applicable law:

- Processing personal data only on documented instructions from the controller, including with regard to international transfers
- Ensuring that all personnel with access to personal data are subject to binding confidentiality obligations
- Implementing appropriate technical and organisational security measures in accordance with Article 32 EU GDPR
- Engaging sub-processors only following advance notice to controllers and subject to a 30-day objection period, and on equivalent data protection terms
- Assisting the controller in fulfilling data subject rights requests and other compliance obligations

- Notifying the controller without undue delay upon becoming aware of a personal data breach
- Deleting or returning personal data to the controller upon termination of services, in accordance with the controller's instructions
- Supporting the controller in conducting data protection impact assessments and prior consultations where required
- Making available all information necessary to demonstrate compliance and supporting audits conducted by or on behalf of the controller

2.2 Lawful Basis for Processing

The legal basis on which your personal data is processed is determined by the relevant data controller, not by Meili. This will be set out in the data controller's own privacy notice, which you will be presented with at the point your personal data is collected. Meili processes your personal data solely on that basis and on the controller's documented instructions, typically in connection with the performance of a contract for car rental services or where the controller has a legitimate interest in providing support and ensuring service integrity.

3. Personal Data We Process

3.1 Categories of Data Subjects

Depending on how the services are used, Meili may process personal data relating to:

- Individuals making car rental bookings
- Passengers or additional drivers included in bookings
- Loyalty programme members
- Employees, agents or representatives of partner organisations
- Supplier representatives

3.2 Personal Data Retained by Meili

Meili retains only a limited set of personal data following completion of a booking. This data is held solely to enable Meili's support team to assist with reservation-related enquiries raised directly with Meili or referred by a controller partner.

Category	Data elements retained by Meili	Retention period
Booking-related personal data	Name Email address	6 years from date of booking, see Section 5.3

	Phone number Booking reference / reservation ID	
Booking and transaction data	Rental Car Details (vehicle type, pick-up/drop-off location and rental dates)	6 years from date of booking, see Section 5.3

3.3 Personal Data Processed in Transit (Not Retained by Meili)

In the course of facilitating bookings, Meili's platform may also process a broader range of personal data on behalf of the controller. This data passes through Meili's systems to enable the booking but is not retained by Meili beyond the period necessary for transmission. It includes:

Category	Examples
Extended identification data	Date of birth, age category, country of residence, passport number (where required by the car rental provider)
Booking and transaction data	Passenger Name Record (PNR) data, flight numbers, booking status, Loyalty Program Number
Technical data	IP address, device identifiers, cookie identifiers, API logs, system logs, device and browser information
Marketing data (where enabled by controller)	Marketing consent status, consent timestamp, communication preferences, campaign interaction data

If you submit a subject access request, Meili's response will be limited to the data it retains (Section 3.2). For a complete picture of how your personal data is held and used, please contact the relevant data controller.

3.4 Special Categories of Data

Meili does not knowingly process special categories of personal data (as defined under Article 9 EU GDPR and equivalent provisions under applicable law). Where such data is processed, this occurs only on documented instructions from the data controller and subject to appropriate safeguards as required by law.

3.5 Age of Users

The Meili platform facilitates car rental bookings, which require a valid driving licence. The services are intended solely for individuals who meet the minimum legal age to hold a driving licence in their jurisdiction. Meili does not knowingly process personal data relating to individuals who do not meet this requirement.

Where a data controller has reason to believe that a user does not meet the applicable minimum age, it is the controller's responsibility to prevent access to the services and to notify Meili accordingly. If Meili becomes aware that personal data has been processed in relation to an individual who does not meet the minimum age requirement, it will delete that data promptly and notify the relevant controller.

3.6 Provision of Personal Data - Mandatory or Voluntary

Most personal data processed in connection with a car rental booking is required in order to complete the booking and enter into a contract with the relevant car rental provider. Without identification data and booking details, the booking cannot be processed.

Some personal data, such as marketing preferences or loyalty programme details, is optional. The determination of what data is mandatory or optional, and the consequences of not providing it, is the responsibility of the relevant data controller and will be set out in their privacy notice.

4. Purposes of Processing

Meili processes personal data only on behalf of and under the instructions of the relevant data controllers. Processing is carried out for the following purposes:

- Enabling and operating Meili services within partner environments
- Facilitating and managing car rental bookings with suppliers
- Retaining limited booking-related personal data to enable Meili's support team to assist with reservation-related enquiries raised directly with Meili or referred by a controller partner, see Section 5 for applicable retention periods
- Supporting data controllers in fulfilling data subject rights requests
- Enabling loyalty programme integrations
- Supporting analytics, reporting and operational optimisation on behalf of controllers
- Facilitating fraud prevention, platform security and system integrity
- Maintaining system logs and audit trails
- Supporting optional marketing services where explicitly activated by the controller
- Complying with documented controller instructions and applicable legal obligations

Automated decision-making	Meili does not carry out automated decision-making or profiling that produces legal or similarly significant effects on individuals. Where a data controller instructs Meili to carry out any such processing on their behalf, this will be disclosed in the controller's own privacy notice.
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5. Data Retention

5.1 General Principle

Meili retains personal data only for as long as is necessary for the purposes for which it was collected and processed, in accordance with the storage limitation principle under Article 5(1)(e) EU GDPR and equivalent provisions under applicable law. Personal data is securely deleted or anonymised once the applicable retention period has expired.

5.2 Controller-Directed Retention

Where a data controller provides specific retention instructions, Meili will apply those instructions. In the absence of specific instructions, Meili applies the default retention periods set out in Section 5.3 below. Upon termination of services, personal data is deleted, anonymised, or returned to the controller in accordance with their instructions and the terms of the applicable data processing agreement, unless retention is required by applicable law.

5.3 Default Retention Periods

Data category	Default retention period	Basis
Booking-related personal data retained by Meili	6 years from date of booking	Aligns with standard contractual limitation periods across EU member states and the UK. A shorter period may be applied on instruction from the relevant controller.
Technical and system log data (including IP address data held for security purposes)	Up to 12 months	Operational necessity for security monitoring, fraud prevention and system integrity. Retained for the minimum period necessary for these purposes.
Marketing-related data	12 months from date of last engagement,	Retained for the minimum period necessary to fulfil marketing purposes activated by the

	or until consent is withdrawn (whichever is earlier)	controller. Deleted promptly upon withdrawal of consent.
Encrypted backup data	Maximum 14 days (rolling cycle)	Backup data is subject to strictly restricted access and is not used for any operational purpose beyond disaster recovery.
Data subject to legal hold	For the duration of the relevant legal obligation or proceedings	Where applicable law, regulatory obligation, or ongoing legal proceedings require retention beyond the standard period. Deleted as soon as the obligation ceases.

If you wish to request erasure of your personal data before the expiry of the applicable retention period, please contact the relevant data controller. Meili will action any such instruction from a controller promptly and in accordance with our data subject rights process.

5.4 Jurisdiction-Specific Retention Obligations

In certain jurisdictions, statutory obligations may require personal data to be retained for specific minimum periods. These include, without limitation:

- EU and EEA member states: sector-specific obligations under national law implementing EU directives
- United Kingdom: obligations under the Companies Act 2006, UK tax legislation, and sector-specific regulatory requirements
- United States: obligations under applicable federal and state law, including California law where the CCPA/CPRA applies
- Other jurisdictions: applicable local statutory retention obligations

Where such obligations apply, Meili retains personal data for the minimum period required by law, after which it is securely deleted or anonymised.

6. Data Sharing

6.1 Sharing on Controller Instructions

Meili does not share personal data except as required to deliver the services or as instructed by the relevant data controller. Any sharing of personal data by Meili is carried out in

accordance with the data controller's instructions. Meili will not share personal data beyond what is necessary for the stated purpose.

6.2 Sub-processors

Meili engages the following authorised third-party service providers ("sub-processors") to support delivery of the services. All sub-processors are:

- Engaged in accordance with Article 28 EU GDPR and equivalent applicable law
- Contractually bound to provide a level of data protection no less protective than that required under Meili's agreements with controllers
- Subject to a 30-day notice period during which the relevant controller may raise a written objection before any new sub-processor is engaged

Controllers will be notified in advance of any intended changes to sub-processors. For queries regarding sub-processors please contact dataprotection@meili.travel.

Sub-processor	Service description	Data location	Company location
Amazon Web Services EMEA SARL	Cloud hosting provider. Hosts the Meili platform including applications, portal and database. Data is encrypted at rest and in transit.	Ireland	19-23 Exchequer Street, Dublin 2, Ireland
Datadog Inc.	Logging, monitoring and cloud SIEM. IP address data is processed to safeguard against malicious activity and denial of service attacks.	Germany	1 Dockland Central, Guild Street, Dublin 1, Ireland
Snowflake Inc.	Data warehouse. Stores platform performance and analytics data. IP address is stored in encrypted form to support fraud prevention and security monitoring.	Ireland	70 Sir John Rogerson's Quay, Dublin 2, Ireland

6.3 Legal Disclosures

Meili may disclose personal data to regulatory authorities, law enforcement bodies, or courts where required to do so by applicable law or a binding legal order. Where permitted by law, Meili will notify the relevant controller before making such a disclosure.

7. International Transfers

7.1 Current Position

All Meili staff with access to personal data processed in connection with the services are currently based in the EU/EEA. Personal data processed and retained by Meili is stored within the EU/EEA. All of Meili's current sub-processors are based within the EU/EEA and process data on infrastructure located within the EU/EEA. Meili does not currently make any international transfers of personal data.

In the event that this changes, Meili will notify the relevant controllers in advance and ensure that appropriate safeguards are in place before any transfer takes place, as set out in Section 7.2 below. Details of sub-processors and their processing locations are set out in Section 6.2.

7.2 Transfer Safeguards

In the event that international transfers become necessary in future, Meili will ensure that one or more of the following safeguards is in place before any transfer takes place:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- The UK International Data Transfer Agreement (IDTA) or UK Addendum to EU SCCs, for transfers from the UK
- An adequacy decision by the European Commission or UK Secretary of State in respect of the destination country
- Other lawful transfer mechanisms recognised under applicable data protection law

Transfer Impact Assessments will be conducted where required. Any change to Meili's processing locations or sub-processors that gives rise to a new international transfer will be notified to the relevant controllers in advance in accordance with the applicable data processing agreement.

8. Security

Meili implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in accordance with Article 32 EU GDPR and equivalent provisions under applicable law. Measures include:

- Documented security policies, governance controls, and regular risk assessments
- Encryption of data in transit (TLS 1.2 or higher) and at rest
- Network security controls, monitoring, and logging
- Segregation of production, development, testing, and staging environments
- Vulnerability scanning and penetration testing
- Patch and release management processes
- Role-based access controls and multi-factor authentication for systems holding personal data
- Confidentiality obligations for all personnel with access to personal data
- Secure transfer protocols (SFTP or time-limited encrypted links) for any transmission of personal data to controllers in fulfilment of data subject rights requests, plain email attachments are not used

In the event of a personal data breach, Meili will notify the relevant controller without undue delay and, in any case, within the timeframe required under applicable law, to enable the controller to fulfil its own notification obligations.

9. Data Subject Rights

9.1 How to Exercise Your Rights

Because Meili acts solely as a data processor, your data protection rights should be directed to the relevant data controller - the car rental provider or the partner platform through which you made your booking. The controller is responsible for handling your request and responding within the timeframes required by applicable law.

If Meili receives a data subject rights request directly, we will promptly forward it to the appropriate controller and assist the controller in fulfilling their obligations as required under our data processing agreement and applicable law. Meili does not respond to data subjects directly except where the controller has explicitly instructed it to do so.

9.2 Rights Under EU and UK GDPR

Where EU or UK GDPR applies, you may have the following rights. Please direct these to the relevant data controller:

Right	What it means
Access (Art. 15)	The right to obtain confirmation of whether your personal data is being processed and, if so, a copy of that data. Note: Meili retains only the data described in Section 3.2; for a complete picture please contact the data controller.
Rectification (Art. 16)	The right to have inaccurate personal data corrected or incomplete data completed.
Erasure (Art. 17)	The right to request deletion of personal data where it is no longer necessary, consent is withdrawn, or processing is unlawful. Meili will action any such instruction received from the controller promptly.
Restriction (Art. 18)	The right to restrict processing in certain circumstances, for example while accuracy is contested.
Portability (Art. 20)	The right to receive personal data in a structured, machine-readable format and to transmit it to another controller, where processing is based on consent or contract and is carried out by automated means.
Objection (Art. 21)	The right to object to processing carried out on the basis of legitimate interests or for direct marketing purposes.
Automated decisions (Art. 22)	The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects. Meili does not carry out such processing.

9.3 Rights Under CCPA/CPRA (California Residents)

If you are a California resident and the CCPA/CPRA applies to the processing of your personal data, you may have additional rights, including the right to know, the right to delete, the right to correct, and the right to opt out of the sale or sharing of personal data. As Meili acts as a service provider under California law, these rights should be exercised with the relevant business (data controller). Meili will assist controllers in fulfilling their obligations under California law where required.

9.4 Rights in Other Jurisdictions

Data subjects in other jurisdictions may have additional rights under applicable local law, including under Brazil's Lei Geral de Proteção de Dados (LGPD) and India's Digital Personal Data Protection Act (DPDPA). These rights should be exercised with the relevant data controller. Meili will assist controllers in fulfilling such obligations as required and applies consistent data protection standards globally.

10. Marketing Services

Meili may provide marketing-related services where this has been explicitly enabled by the relevant data controller. In such cases:

- The data controller is responsible for obtaining and managing consent and ensuring a lawful basis for marketing communications
- Meili processes marketing-related personal data solely on the documented instructions of the data controller
- Meili does not use personal data for its own marketing purposes

If you wish to withdraw consent or manage your marketing preferences, please follow the instructions in the relevant communication or contact the data controller directly.

11. Cookies and Tracking Technologies

Where Meili's technology is embedded within a partner platform, cookies or similar tracking technologies may be used in connection with the services. The use of such technologies is governed by the cookie policy and consent mechanisms of the relevant partner platform (data controller). Meili processes any data collected via such technologies solely on the controller's instructions and does not retain such data beyond what is necessary to deliver the service.

12. Contact and Complaints

12.1 Contact Meili

For general queries about this Privacy Notice or Meili's data protection practices:

Organisation	Meili Travel Technology Limited
Address	29 Earlsfort Terrace, Dublin 2, D02 AY28, Ireland
Email	dataprotection@meili.travel

12.2 Supervisory Authority

As Meili is incorporated in Ireland, the lead supervisory authority for EU GDPR purposes is the Data Protection Commission (DPC) of Ireland. You have the right to lodge a complaint with the DPC, or with the supervisory authority in your country of residence or place of work, if you believe that the processing of your personal data infringes applicable law.

Because Meili acts as a data processor, complaints relating to how your personal data is used are most appropriately directed to the relevant data controller in the first instance.

- Data Protection Commission (Ireland): www.dataprotection.ie
- Information Commissioner's Office (UK): www.ico.org.uk

13. Changes to this Privacy Notice

Meili may update this Privacy Notice from time to time to reflect changes in our services, applicable law, or data protection practices. The current version is available at www.meili.travel/platformprivacy and the date of the most recent update is shown at the top of this Notice.

Where changes are material, such as a change to the categories of data retained, the sub-processors engaged, or how data subjects can exercise their rights, Meili will take active steps to bring those changes to the attention of data subjects through the relevant data controllers, rather than relying solely on this page being updated. Minor or administrative updates will be reflected in the Notice without separate notification.