1. Introduction

Whenever the text refers to Obsidian Car Rental, the data controller is:

Ideenfabrik ehf Laugatun 13 550 Sauðárkrókur Iceland Email: privacy@car-rental.is Tel.: +354 8495329

Welcome to Obsidian Car Rental ("we", "our", "us"). We operate the website www.carrental.is (the "Site"), through which customers can book passenger vehicles for short- or long-term hire in Iceland. Protecting your privacy and the security of your personal information is central to our business. This Privacy Policy explains what data we collect, why we collect it, how we use it, and the rights you have under the EU General Data Protection Regulation 2016/679 (GDPR) and the Icelandic Data Protection Act No 90/2018.

2. Data Controller

For all processing activities described here, the Data Controller is:

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3. Personal Data We Collect

Category	Examples	Collected When	Mandatory?
Identification data	Full name, nationality, driver's- licence number & expiry	During booking, check-in	Yes

Contact data	Email address, mobile number	Booking, contact forms	Yes
Rental details	Vehicle class, pick- up & drop-off dates/locations, accessories	Booking	Yes
Technical data	IP address, browser type, device identifiers, cookies	Site visit	No (cookies subject to consent banner)
User-generated data	Messages, feedback, support requests	When you write to us	No

4. Purpose & Legal Basis of Processing

Purpose	Legal basis (Art. 6 GDPR)	
Concluding and performing the rental contract, including identity and licence verification	Art. 6 (1)(b) – contract performance	
Complying with legal obligations (traffic fines, insurance, tax records)	Art. 6 (1)(c) – legal obligation	
Fraud prevention and security	Art. 6 (1)(f) – legitimate interest	
Customer support and service quality	Art. 6 (1)(f) – legitimate interest	

Marketing emails about similar services (opt-out anytime)	Art. 6 (1)(f) – legitimate interest
Optional newsletters or promotions	Art. 6 (1)(a) – consent
Cookie-based analytics	Art. 6 (1)(a) – consent

5. Payment Processing with Rapyd

When you confirm a booking, you are redirected to Rapyd's secure environment. Rapyd collects and processes your card or e-wallet data under its own Privacy Policy and is solely responsible for that data. We receive from Rapyd only:

- A payment token / transaction ID
- Payment status (e.g., "paid", "refunded")
- Limited fraud-screening results (pass/fail)

We never see or store your full card number, CVC, or banking credentials. Questions about payment data should be addressed to Rapyd directly at privacy@rapyd.net.

6. Cookies & Similar Technologies

Our cookie banner lets you choose:

- Necessary cookies load the Site, remember language, secure log-in.
- Analytics cookies measure traffic (Google Analytics 4, IP anonymised).
- Marketing cookies only if you opt in.

You can withdraw consent anytime via the "Cookie Settings" link in the footer or through your browser settings.

7. Data Retention

Data set	Retention period
Rental contracts & invoices	7 years (Icelandic bookkeeping law)
Driver's-licence images	Deleted 30 days after vehicle return (unless a claim is open)
Customer support emails	2 years
Analytics data	14 months (Google Analytics 4 standard)
Marketing consent records	Until withdrawn + 2 years

8. Recipients & International Transfers

We share data only when necessary:

- Cloud hosting (EU-based data centre)
- Email service provider (EEA)
- Vehicle telematics provider (if installed)
- Rapyd (Section 5)
- Insurance companies and law-enforcement authorities (where required by law)

If a service provider is located outside the EEA, we rely on an EU adequacy decision or Standard Contractual Clauses to safeguard your data.

9. Your Rights

Under GDPR you may, at no cost:

- 1. Access your personal data.
- 2. Rectify inaccurate or incomplete data.
- 3. Erase data ("right to be forgotten") when legal grounds permit.
- 4. Restrict or object to processing.
- 5. Port data to another controller.
- 6. Withdraw consent at any time (affects future processing).
- 7. Lodge a complaint with the Icelandic Data Protection Authority (Persónuvernd) at postur@personuvernd.is.

To exercise any right, email privacy@car-rental.is. We may ask for proof of identity before fulfilling your request.

10. Security Measures

We implement industry-standard technical and organisational measures, including:

- HTTPS/TLS 1.3 encryption
- ISO 27001-certified hosting provider
- Role-based access control & MFA for staff
- Regular vulnerability scans and penetration tests
- Encrypted backups stored within the EEA

11. Children

Our services are not intended for children under 18. We do not knowingly collect data from minors.

12. Changes to This Policy

We may update this Privacy Policy to reflect changes in our practices or legal obligations. The "Last updated" date at the top will be revised accordingly. Substantial changes will be announced via email or on the Site at least 30 days before they take effect.

13. Contact

Questions, concerns, or requests related to privacy:

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