

PRIVACY POLICY

PREAMBULE

By providing personal information to **AirRefund**, you allow us to collect and process said information in accordance with this Privacy Policy that we are committed to respect.

Subject to legal and contractual requirements, you may refuse or withdraw your consent at any time simply by contacting us. Nevertheless, the collection and processing of your data may be necessary for the proper implementation of our action.

This Privacy Policy informs you of the methods we use to process your personal data with respect to privacy and liberties.

1. Legal provisions

AirRefund, company registered under Swiss law, is directly subject to the following legal provisions:

- Federal Act on the Data Protection (FADP) of 19 June 1992, which entered into force on 1 January 2014;
- Recommendations of the Federal Data Protection and Information Commissioner (FDPIC);

It should be noted that, by the decision No 2000/518/EC of 26 July 2000 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data, the Commission held that Swiss rules provide for a level of protection in line with European Union expectations.

Moreover, **AirRefund** asserts that the prior declarations required by the CNIL for foreign companies which use French processing means after they had appointed a French representative (declaration No 1909840) have been met.

2. Content of collected data

Personal data that may be subject to processing by **AirRefund** are the following:

First name and last name of the passenger; email address of the passenger and of the people they want to sponsor; flight booking data (reservation number, e-ticket number, city of the airport of departure and of arrival of the flight or flights in case of connection, the name of the effective and/or of the issuing airline, the name of the travel agency; dates and time of departure and arrival, flight numbers); the type of payment card used by the passenger to pay for the flight; phone number and mailing address of the passenger; data transcribed in the documents given by the passenger; bank account number or information relating to their Paypal account; and when appropriate, information concerning donations.

3. Data collection tools

Your personal data is collected thanks to the claim form that is available on our website, the email exchanges throughout the management of the claim and/or thanks to partnership contracts concerning data transfer.

4. Data protection: respect of privacy and liberties

Purpose:

The collected personal data is registered, processed and reported to third parties in the management of the claim (customer services and legal services of airlines and legal partners) only for the purposes of: (i) an individual follow-up in the management of the claim, (ii) a

transmission of information concerning our service and (iii) the establishment of a performance indicator in order to identify points for improvement of our service.

Under no circumstances shall data be the subject of sharing, sales or rental contracts, whether free of charge or in return for payment, with third parties.

Deletion:

The personal data retention is useful only during the time strictly necessary for the performance of **AirRefund's** service and shall not exceed (12) months after the end of the compensation claim.

Right of access, rectification and opposition:

The right of access is available to concerned persons following a request for the entire content of their data. This right allows the control of the accuracy of data. In accordance with the right of access, **AirRefund** undertakes to detail all personal data processed for a given person within (2) working days from the receipt of the request from the concerned person.

The right of rectification is available to concerned persons who wish to modify their data. In accordance with the right of rectification, **AirRefund** undertakes to rectify personal data within (2) working days from the receipt of the request from the concerned person.

The right of opposition is available to concerned persons who wish to refuse that their personal data be used for certain ends mentioned during the collecting. For instance, they may request that their personal data does not appear in the distribution list. In accordance with the right of opposition, **AirRefund** undertakes to delete personal data from all its systems within (2) working days from the receipt of the request from the concerned person.

Any request relating to the use of the rights of access, rectification or opposition to personal data must be made by email to contact@airrefund.com.

5. Data protection: security and integrity

AirRefund undertakes to ensure the integrity and reliability of data that are given by forestalling any alteration or destruction of said data, especially by ensuring limited access to data solely to people authorised to process them.

When a provider who acts in the data processing has its head office in a non-member State of the European Union and in which the law does not offer a sufficient level of protection of data in light of the Community provisions, **AirRefund** undertakes to regulate by contract the personal data transfer in order to ensure an appropriate protection of the said data in accordance with the standard contractual clauses set out by the European Commission.

Data storage:

The data storage is entrusted to the companies HEROKU and SALESFORCE of which data centres, located respectively in Dublin (Ireland) and London (United Kingdom), are secured and only accessible by **AirRefund**.

Claim management software:

AirRefund mainly uses the CRM software (Customer Relationship Management) of SALESFORCE which provides for an optimum security system by putting into place a firewall protection, a system of intrusion detection, a SSL encryption and products of priority safety.