

PERSONAL DATA PROTECTION POLICY

Our job is to claim from the airlines compensation that may be due to you in case of a flight disruption.

In order to do so, it is necessary that you send us a lot of information about yourself and in particular: your identity and travel documents, your email address, possibly your telephone number, the names of others passengers if they were travelling with you.

We consider that the protection of personal data is essential: it is a fundamental aspect of our business and customer relations. That is why we make every effort to comply with the legal provisions that protect you and your data:

- Compliance with the applicable Swiss rules (since our headquarters are in Geneva)
- Declaration n°1909840 to the CNIL, Commission Nationale de l'Informatique et des Libertés (French Authority notably in charge of the protection of personal data)
- Compliance with the European Directive 95/46/EC replaced by the "General Data Protection Regulation 2016/679" (the "**GDPR**") since May 25th, 2018.

This document is our Personal Data Protection Policy (the "**Policy**"): it explains how we collect and process your personal data and gives you all the information you need to understand how you can control their use.

WE CHOOSE AN INTUITIVE 12 QUESTIONS ANSWERS FORMAT:

1. What does our Policy cover?
2. What are personal data?
3. What personal data do we collect?
4. How do we collect your personal data?
5. For which "purpose of the processing"?
6. To whom do we transfer your personal data?
7. How do you give us your consent?
8. What about your children's consent?
9. For how long do we keep your personal data?
10. How do we protect your personal data?
11. What are your rights and how may you exercise them?
12. Focus on the use of cookies



1) WHAT DOES OUR POLICY COVERS?

It applies to all personal data that we are likely to receive via our Internet site <http://www.airrefund.com> and all its tree structure and declinations, via pages and accounts created on social networks, and processed via all our tools and software. It does not apply to websites or tools and software of third parties (our customers, partners, sponsors or any other third party etc.) even if a link to their website appears on our website and even if they are our suppliers, service providers or subcontractors.

2) WHAT ARE PERSONAL DATA?

personal data are all information relating to an identified or identifiable person (for instance, your name, your booking reference number). Such information is considered as personal data since it makes you identifiable by the airline) ("**Personal Data**").

3) WHAT ARE THE PERSONAL DATA WE COLLECT?

When you fill in a **form**: the personal data you must (or choose) to fill in the boxes "name, first name, email, telephone number and comment" for yourself and, if applicable, for the persons who were travelling with you and mandated you to fill in their form on their behalf.

When you send your **documents**:

- At least one identity document: birth date, sex, civil status, marital/parental status, physical characteristics (as they appear on your photo, your size and colour of your eyes), identity document number and home address;
- At least one travel document: booking reference number (PNR), electronic ticket number, all other information displayed on your booking reservation such as a disability (request for assistance or a wheelchair) or any food allergy;
- All other personal data that may appear on any other document you decide to send us (for example a medical certificate).

When you sign our **letter of authority**:

- Your IP address in order to insure the validity of your electronic signature.
- Your postal address.

When **your claim is won**: your bank details (RIB key) or BIC/IBAN (European version).

At any time: all other data you may have provided during your exchanges with AirRefund throughout the claim management process, it being specified that we only process the data that are necessary for our purpose, i.e. to carry out our mission.

4) HOW DO WE COLLECT OUR PERSONAL DATA?

Through our website <http://www.airrefund.com> or one of its versions: either through the online form in the "Contact" section, or through the online form in the "Start your claim" section, then if your file appears eligible, through our second form in which we ask you a few more questions to check eligibility.

Through emails: as soon as we exchange by email, throughout your claim management, and especially when you send us your documents.

Through your company if you are a business traveller (within the framework of a partnership contract concluded with your company and its professional travel agency). The email you receive contains a link to our second form.

5) FOR WHICH « PURPOSE OF THE PROCESSING »?

The purpose of collecting and processing your personal data is to give us the opportunity to take all the necessary measures to complete your claim: follow-up of your file, transmission to the concerned intermediaries (see question n°6), amicable negotiations with the airlines and sometimes litigation follow-up and, if successful, payment of your compensation. In addition, if successful, your file reference (indirect personal data) may be used to support requests from other passengers on the same flight.

Finally, your personal data may be used to enable us to establish performance indicators in order to continually improve our service (anonymous and optional satisfaction survey).

6) TO WHOM DO WE TRANSFER YOUR PERSONAL DATA?

First of all, please be aware that your personal data will never be sold, rented or shared in any way for commercial purposes (neither free of charge nor for consideration).

However, your personal data are of course transmitted to various parties who process them for the purpose of your claim management (see question n°5): to the airlines' customer and/or legal departments, to the competent national enforcement bodies present in various European Union members, such as the CAA in the United Kingdom), if necessary to a lawyer (but only with your prior written consent) who may bring your case before a court, or to any other entity that could allow your case to be won.

In addition, your personal data may be transmitted to other strictly defined and authorized recipients, such as an outsourced customer service department (so that we can talk to you over the phone more often, which is fundamental in our conception of customer relations, while, at the same time, we are managing your claims), or our technical and IT support.

These various contacts are therefore likely to contact you, but only as part of the follow-up and progress of your claim.

Please be aware that we ensure that our partners and subcontractors offer at least equivalent guarantees in terms of personal data protection.

7) HOW DO YOU GIVE US YOUR CONSENT?

Obtaining consent is mandatory for data processing to be authorised (European provisions). In this case, your consent is implied, unless you tell us otherwise. By connecting to our various tools and using our services, you are giving your consent for:

- collecting and using your personal data under the set-out conditions of this Policy;
- your data are potentially transferred outside your country of connexion (including countries outside the European Union) but only so that we can carry out our mission. In the event of a transfer outside the European Union, we will ensure that specific measures are taken to regulate these transfers, in particular through the use of clauses provided for by European law.

Finally, please be aware that you may withdraw your consent at any time (see the section "How to exercise my rights"), it being specified that if the withdrawal results in the early termination of our contract, you may be liable to the payment of early termination fees as specified in our general terms and conditions of sale.

8) WHAT ABOUT YOUR CHILDREN'S CONSENT?

For all persons under 16 who contact us, we must obtain their legal representative's consent: failing that, personal data are destroyed. Beyond the age of 16 and in terms of personal data, the person is considered to be over the age of legal majority and capable of disposing of his or her data alone.

9) HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Your personal data shall be kept for no longer than is necessary for the purposes of processing (see question n°5), i.e. until your claim is closed. Thereafter, your personal data are archived for the entire legal period of retention of evidence (to justify our income and our actions for example). At the end of this legal period, your personal data are destroyed. You will be notified of this destruction.







10) HOW DO WE PROTECT YOUR PERSONAL DATA?

We aim to process your personal data in the most secure way. To this end, we take all appropriate physical, technical and organisational measures to guarantee their confidentiality and prevent, as far as possible, any alteration, loss or unauthorised access to your data. In particular, all persons having access to your personal data are bound by an obligation of confidentiality and are subject to disciplinary measures and/or other sanctions if they do not respect their obligations.

Your Personal Data are hosted within the European Union (Ireland and Germany). In line with the GDPR obligations and business needs, we have decided to develop our own claim management tool.

11) WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

Now that you know what happens to the personal data you entrust us with, here is a description of the various rights you may exercise. There are 6 of them:

-  **Right of access:** the possibility of requesting that you be informed of the entire content of the personal data you have communicated to us;
-  **Right to rectification:** the possibility to ask your personal data rectification, in case they would be erroneous.
-  **Right to object:** you may object to the processing of your personal data, for legitimate reasons, and for certain purposes mentioned at the time of collection. For example, you can request that your personal data no longer appear on a mailing list (which is currently not the case with AirRefund);
-  **Right to portability:** the possibility to receive your personal data transmitted in a structured, commonly used and machine-readable format and to transport these data for a processing by another entity;
-  **Right to erasure ('right to be forgotten'):** the possibility to request the deletion of your personal data as soon as possible if (i) the processing is not necessary for the aforementioned purposes (see question n°5), (ii) consent has been withdrawn (see question n°7), (iii) the data subject has objected to the processing, (iv) the processing is unlawful, (v) the deletion is required to comply with a legal provision and finally (vi) the collected personal data concern persons under 16 years old on social networks (see question n°8).
-  **Right to restriction:** the possibility of limiting the processing of personal data in the event that (i) the accuracy of the personal data processed is contested, for a period enabling us to verify it, (ii) the processing is unlawful and you oppose the erasure and instead require the restriction of their use, (iii) we no longer need the personal data for the aforementioned purposes but they are still required by you for the establishment, exercise or defend of legal claims.

You may exercise any of these rights at any time with AirRefund, in its capacity as controller of your personal data. Any request relating to the use of these rights must be made by email and sent to dataprotection@airrefund.com and will be processed within 15 working days from receipt of your request before courts.

Attention however, the exercise of these rights cannot be abusive, you may not invoke them to earlier terminate our mandate or to claim its inapplicability when, for example the company chooses to compensate you directly on your bank account while we manage your claim. If you do so, you may be subject to early termination fees.

12) FOCUS ON THE USE OF COOKIES

We may use cookies or similar technologies to ensure the best possible user experience and to analyse trends by tracking your usage patterns. Cookies are small text files stored on a user's device to track usage patterns and preferences. Our cookies do not contain personal identifiable information. We automatically collect some information through the use of cookies and tracking technologies, such as Internet Protocol (IP) address, browser type, Internet service provider, referring/exit pages, viewed files on our website (such as HTML pages, illustrations), operating system, date and/or clickstream data in order to analyse overall trends and administer the website. You can control the use of cookies individually in your browser. However, if you choose to disable cookies, it may limit the display of certain features or functionalities within our services or on our website.



YOU HAVE MORE QUESTIONS? CONTACT OUR « DPO »

If you have any questions about this Policy, you may contact our Data Protection Officer at DPO@airrefund.com. Please note, however, that no question related to the progress of a claim will be dealt through this email address: any email in this regard will unfortunately be deleted without transfer.