

PRIVACY POLICY

This is the AIR ALSIE A/S Privacy Policy. AIR ALSIE A/S, Lufthavnsvej 3, DK-6400 Sønderborg. CVR nr. 12655983, Telefon +45 7442 9888, e-mail: op@alsie.com is responsible for the data collected about passengers. AIR ALSIE A/S collects, uses and discloses Customer Data in order to provide you with a safe, smooth, efficient and customized experience with AIR ALSIE A/S. The collection, use and disclosure of Customer Data enables AIR ALSIE A/S to provide services and products that are most likely to meet your needs and requirements. This Privacy Policy outlines AIR ALSIE A/S's policy and responsibility in relation to the collection, use and disclosure of Customer Data.

By continuing to use AIR ALSIE A/S's services, you signify that you have read, understood and agree to be bound by this Privacy Policy as amended from time to time in respect of AIR ALSIE A/S's collection, use and disclosure of your Customer Data.

1. Types of Customer Data

The types of Customer Data that AIR ALSIE A/S collects depends on the circumstances of collection and on the nature of the service requested or transaction undertaken.

There are two broad categories of Customer Data that AIR ALSIE A/S collects:

- **Personal Data, which includes but is not limited to -**
 - (i) personal information that links back to an individual e.g., name, gender, date of birth, passport or other personal identification numbers, images, photographs, videos, surveillance video footage, voice recordings;
 - (ii) contact information e.g., address, phone number, email address;
 - (iii) payment information e.g., bank details, credit or debit card information, including the name of cardholder, card number, billing address and expiry date;
 - (iv) travel information e.g., flight information, dietary and seating or other service preferences;
 - (v) health information e.g., disabilities, medical records or requests;
 - (vi) technical information e.g., IP address, browser type, etc.
- **Statistical Data e.g.,** number of passengers flown, hits to website. This is stored purely for analytical purposes, and is entirely anonymous. This information will not be stored to your customer record, and will only be aggregated for statistical analysis so that we can better understand AIR ALSIE A/S's customer profile and improve AIR ALSIE A/S's service offering.

For purposes of this policy statement, the phrase '**Customer Data**' includes **Personal Data** and **Statistical Data**.

In some cases, AIR ALSIE A/S needs you to provide Customer Data in order for AIR ALSIE A/S to be able to carry out its services to you.

The failure to supply such Customer Data may result in AIR ALSIE A/S being unable to provide you with the services and/or products requested;

2. Purposes for Collection, Use and Disclosure

Generally, AIR ALSIE A/S collects Customer Data, either directly from you or from your authorized representatives (i.e. persons whom you have authorized, persons who have been validly identified as being you or your authorized representative pursuant to our then-current security procedures), from third parties (e.g., your travel agent or our service provider), or from publicly available sources, through our website, mobile services, and other channels including our ticketing counters, airport operations and personal interaction, in order to fulfil the following purposes, which include but are not limited to:

- Providing services to you such as processing a transaction (e.g., making a booking), providing technical assistance, assisting you in the transaction, providing flight alert messages through AIR ALSIE A/S's mobile services facility, facilitating internet check-in and self check-in, and responding to your enquiries or requests;
- Providing airport services such as processing information relating to connecting flights, arrangements at airports, and customs and immigration facilities;
- Providing baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims;
- Providing in-flight catering and other services that best meet your preferences and needs (which we may collect during our interactions with you);
- Marketing and communicating with you in relation to products and services offered by AIR ALSIE A/S's and service partners, as well as AIR ALSIE A/S's appointed agents;
- Contacting you for product or customer satisfaction surveys;
- Research and analytics purposes, including market research; and
- Safety, security and legal compliance.

AIR ALSIE A/S may also use and disclose your Customer Data with and to third parties in order to fulfil the purposes listed above.

In connection with the above, we may, from time to time, collect, disclose, transfer, and jointly use your Customer Data to and with our subsidiaries and affiliated airlines. In addition, we may disclose your Customer Data to third parties, such as our travel service providers or travel-related businesses, partner airlines, airport management, security personnel, and other operators/carriers.

AIR ALSIE A/S may also use and disclose your Customer Data to persons who have been validly identified as being you or your authorized representative(s) pursuant to our then-current security procedures, for the purpose of the relevant transaction or enquiry. In particular, each of the passengers who are grouped under the same Passenger Name Record (PNR) number shall be deemed to be authorized representatives of each of the other passengers under the same PNR number, for the purposes of disclosure identified in this policy, regardless of the number of persons within each group.

AIR ALSIE A/S shall use its best endeavors to ensure that its employees, officers, agents, consultants, contractors and such other third parties mentioned above who are involved in the collection, use and disclosure of Customer Data will observe and adhere to the terms of this Privacy Policy.

AIR ALSIE A/S may disclose your Customer Data to law enforcement agencies and government for security, customs and immigration purposes. For example, AIR ALSIE A/S and other airlines are required by laws in the United States of America, Great Britain and other countries to provide border con-

trol agencies with access to your booking information or flight itinerary. Accordingly, relevant Customer Data (known as Passenger Name Record (PNR) or Advance Passenger Information (API)) may be disclosed to the appropriate customs, immigration, and/or any other relevant authorities as required by law. Please be informed that the initial recipients of such information may share your PNR and API data with other government agencies or enforcement authorities.

In addition, AIR ALSIE A/S may disclose Customer Data to our legal advisors for establishing, exercising or defending our legal rights, to our other professional advisors, or as otherwise authorised or required by law. AIR ALSIE A/S also reserves the right to share Customer Data as is necessary to prevent a threat to the life, health or security of an individual or corporate entities. Further, AIR ALSIE A/S may disclose Customer Data, as is necessary, to investigate suspected unlawful activities including but not limited to fraud, intellectual property infringement or privacy.

3. Transfer of information overseas

AIR ALSIE A/S Head Office is based in Denmark. Customer Data may be transmitted to data storage facilities where AIR ALSIE A/S keeps its central records. Customer Data may be transferred to AIR ALSIE A/S's offices and appointed agents in Denmark or other countries in connection with AIR ALSIE A/S's performance of the contract with you.

4. Consent

Generally, in the course of AIR ALSIE A/S performing servicing functions such as making a flight booking, transmitting flight alert messages or accepting catering requests, Customer Data will, by nature of the task or transaction, be provided by our customers and passengers to AIR ALSIE A/S. In such instances, consent will necessarily be implied from the Customer that they are agreeable to providing Customer Data in order for AIR ALSIE A/S to provide the requested or necessary service and/or product to them. However, where required by law, AIR ALSIE A/S will adopt an 'opt-in' policy for obtaining customer consent, in which event, express written consent will be sought from you when collecting your Customer Data e.g., signing a form or checking a box. Where you make reservations on behalf of another person, you undertake and will ensure that the individual whose Customer Data is supplied to AIR ALSIE A/S has authorized the disclosure, is informed of and consents to the terms and conditions of this Privacy Policy.

You may submit a request to withdraw your consent at any time by contacting AIR ALSIE A/S.

Statistical Data is not linked to a customer record and AIR ALSIE A/S does not need to seek consent for the collection, use or disclosure of Statistical Data.

5. Access

AIR ALSIE A/S will, upon your written request to our Administration Department (see Section 10), process your request to view your stored Personal Data.

6. Retention

AIR ALSIE A/S will retain Customer Data for as long as it is necessary to fulfill the purpose for which it was collected, the legal or business purposes of AIR ALSIE A/S, or as required by relevant laws.

When destroying Customer Data, we will take commercially reasonable and technically possible measures to make the personal information irrecoverable or irreproducible in accordance with the applicable laws.

7. Accuracy

AIR ALSIE A/S needs your assistance to ensure that your Personal Data is current, complete and accurate. As such, please inform AIR ALSIE A/S of changes to your Personal Data by contacting AIR ALSIE A/S and submitting your updated particulars to AIR ALSIE A/S.

AIR ALSIE A/S may also request Personal Data updates from you from time to time. As detailed in Section 2 above under the “Purposes for Collection, Use and Disclosure” sub-section, your booking information or flight itinerary may be disclosed to the appropriate customs and immigration authorities as required by law. As such, it is important to ensure that the Personal Data contained in your booking information or flight itinerary is current, complete and accurate.

8. Security safeguards

AIR ALSIE A/S takes the security and protection of your Customer Data very seriously. As such, AIR ALSIE A/S makes reasonable security arrangements to protect your Customer Data against loss or theft as well as unauthorized access and undue disclosure.

As an example of a procedural safeguard, AIR ALSIE A/S has implemented various authentication procedures internally and with our external service providers that may involve AIR ALSIE A/S requesting various personal particulars from you in order to verify your identity (or that of your duly authorized agent) before AIR ALSIE A/S processes your request for a particular service, product or transaction.

Examples of technical safeguards include encryption, “firewalls” and Secure Socket Layer (SSL).

If, however, a customer does not take reasonable care to ensure the continued confidentiality and accuracy of their Customer Data, AIR ALSIE A/S will not be liable for any consequential misuse and/or fraud. If you have any concerns about security, you should contact AIR ALSIE A/S (see Section 10).

9. Updates to the privacy policy

AIR ALSIE A/S will amend this Privacy Policy from time to time without notice, and the updated versions will be posted on AIR ALSIE A/S’s website and date stamped so that you are aware of when the Privacy Policy was last updated. Subject to applicable laws, the English version of this Privacy Policy will prevail over any version of this Privacy Policy in another language. In the event of any inconsistency in interpretation between the English version and any translation of the Privacy Policy, this Privacy Policy statement in English will prevail.

10. Contact us

If you have comments, questions or complaints about or requests relating to this Privacy Policy statement, please contact AIR ALSIE A/S in writing at the address below referencing ‘Privacy Policy’:

AIR ALSIE A/S, Lufthavnsvej 3, DK-6400 Sønderborg, e-mail: op@alsie.com, www.alsie.com