

General Data Protection Regulation - Privacy Policy

1. Introduction

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 personal data in accordance with prevailing laws on data protection, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General data Protection Regulation, "GDPR").

AIR ALSIE A/S collects, uses and discloses Personal 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 Personal 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's policy and responsibility in relation to the collection, use and disclosure of Personal 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.

2. Who is responsible for your personal data?

The data controller for any personal data provided to or gathered by the Owner Portal is the AIR ALSIE A/S, Lufthavnsvej 3, DK-6400 Sønderborg. AIR ALSIE A/S has appointed a Data Protection Officer, who can be contacted at the above address DPO Marianne Kjærgaard, MAK@alsie.com.

3. Collecting personal data with cookies

By visiting and using our website(s), cookies are collected and used on the basis of consent. Information in these cookies include browser type, IP address. (hereinafter "Cookiedata").

Cookiedata is used for improvement of the website(s) and the user experience, to deliver our products, services or goods, customer support.

Use of cookies for the purpose of collecting personal data is in accordance with the Cookie Order (No. 1148 of 9 December 2011), section 3.

If you wish to limit or decline the cookies placed on your computer when visiting our website, you can do so at any time by changing your browser settings. However, you should be aware that if you decline or reject cookies it will impact the functionality of the website which means that there are features on the website that you will not be able to see. Any browser allows that you delete cookies collectively or individually. How this is done depends on the used browser. Remember to delete the cookies in all browsers if you use several different browsers.

4. What types of personal data does AIR ALSIE A/S collect?

When you use the website or contact us, we may collect and process different types of information data from you. This may include personal information that you provide directly to us and information that we collect automatically.

AIR ALSIE A/S process the following types of personal data:

- a) Personal data that links back to an individual e.g., name, gender, date of birth, or other personal identification numbers, images, photographs, videos, surveillance video footage.
- b) Contact information e.g., address, phone number, email address.
- c) Employer and/or other corporate affiliation (employer's name, title, work address, contact telephone number).
- d) Passport number, driver's license number or other government identification information.
- e) Information required to fulfill travel requests (including emergency contact information, flight preferences, personal and in-flight needs).
- f) Payment information e.g., bank details, credit or debit card information, including the name of cardholder, card number, billing address and expiry date.
- g) Travel information e.g., flight information, dietary and seating or other service preferences.
- h) Technical information e.g., IP address, browser type, etc.

Statistical Data e.g.:

Number of passengers flown hits to website etc. This is stored purely for analytical purposes and is entirely anonymous. This information will not be stored to your personal record and will only be aggregated for statistical analysis so that we can better understand AIR ALSIE A/S's personal profile and improve AIR ALSIE A/S's service offering.

Depending on the circumstances and only when it is strictly relevant and necessary, we may process special categories of personal data (so-called "sensitive personal data"). This may include:

- a) Passport or other government identification information, which may reveal racial or ethnic origin
- b) Information required to fulfill travel requests and personal needs, such as meal preferences, which may indicate religious or philosophical beliefs.

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- c) Health information of one or more persons (health, illness, diagnosis, etc.).

We process these sensitive personal data for the following purposes: To provide our services.

If we need to collect more personal data than what is specified above, we will inform about this. The failure to supply Data may result in AIR ALSIE A/S being unable to provide you with the services and/or products requested.

5. Purposes for Collection, Use and Disclosure

When it is relevant, personal data is collected directly from you or from external sources. Generally, AIR ALSIE A/S collects Personal 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 our purposes with processing personal data which include but are not limited to:

- a) 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's mobile services facility, facilitating internet check-in and self-check-in, and responding to your enquiries or requests.
- b) Providing airport services such as processing information relating to connecting flights, arrangements at airports, and customs and immigration facilities.
- c) Providing baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims.
- d) Providing in-flight catering and other services that best meet your preferences and needs (which we may collect during our interactions with you)
- e) Marketing and communicating with you in relation to products and services offered by AIR ALSIE's and service partners, as well as AIR ALSIE's appointed agents.
 - i. To send marketing offers
 - ii. To make analyses/statistical analysis in order to provide you with relevant marketing offers, events and information
 - iii. To send you surveys to give you a possibility to influence our offers and services
- f) Contacting you for product or customer satisfaction surveys.

AIR ALSIE A/S may also use and disclose your personal 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 personal data to and with our subsidiaries and affiliated airlines. In addition, we may disclose your personal 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 personal 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 personal data will observe and adhere to the terms of this Privacy Policy.

AIR ALSIE A/S may disclose your personal 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 control agencies with access to your booking information or flight itinerary. Accordingly, relevant personal 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 personal data to our legal advisors for establishing, exercising or defending our legal rights, to our other professional advisors, or as otherwise authorized or required by law. AIR ALSIE A/S also reserves the right to share personal 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 personal data, as is necessary, to investigate suspected unlawful activities including but not limited to fraud, intellectual property infringement or privacy.

From time to time, we use external companies as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed on the basis of a data processor agreement in accordance with the requirements hereto under GDPR. Where the external parties are data controllers, the processing of personal data will be performed based on said external parties' own data privacy policy and legal basis which the external parties are obligated to inform about unless the applicable legislation allows otherwise.

6. Accuracy

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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 5 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.

7. 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.

8. Transfer of information overseas

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

AIR ALSIE do not transfer personal data to countries or international organisations outside the EU/EEA unless it is necessary on your specific request.

If we transfer personal information to countries outside of the European Union in the course of sharing information as set out below, we will ensure that we transfer the information to parties that provide adequate safeguards for your personal data. This may include parties that have self-certified to the EU-U.S. Privacy Shield, implemented binding corporate rules, or adopted standard model clauses approved by the European Commission.

9. Transfer to third-party service providers

We may engage other companies and individuals, located inside and/or outside the European Union, to perform functions on our behalf. We share your personal data only with third parties that follow practices at least as protective as those described in this Privacy Policy. AIR ALSIE requires third parties to which it discloses personal information to restrict their use of such information to the purposes for which it has been provided by AIR ALSIE and not to disclose that information to others.

10. Links to Third Party Sites

We may link to other sites or apps or have third party services on our platforms we don’t control. If you click on a third-party link, you will be taken to a platform we do not control. This policy does not apply to the privacy practices of those websites or platforms. We are not responsible for these third parties.

11. Legal basis for processing personal data

We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

If we have asked for a consent for the processing of specific personal data, the legal basis for such personal data is a consent, cf. article 6(1)(a) of the GDPR, as the consent can always be withdrawn by contacting us via the contact details provided at the end of this Policy, and, if the consent is withdrawn, the personal data processed on the basis of consent is deleted, unless it can or must be processed, for example, in order to comply with legal obligations.

Where it is strictly relevant and necessary, sensitive personal data (the “special categories of personal data” listed in the GDPR, article 9(1)) is processed. In this case the processing will only take place when permitted by the GDPR, article 9(2) to article 9(4), including but not limited to the following instances:

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After collecting explicit consent in accordance with the GDPR, article 9(2)(a), as the consent can be withdrawn at any time by contacting us via the contact information provided at the end of this Policy, and, if the consent is withdrawn, the personal data that is processed on the basis of the consent will be erased, unless it can or must be processed for other reasons such as complying with law obligations.

12. How does AIR ALSIE A/S protect my personal information?

AIR ALSIE A/S take appropriate administrative, physical and technical measures to protect your data from loss, manipulation and unauthorized access.

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

Although we are committed to maintaining accurate information and we use reasonable efforts to safeguard information, transmission via the internet is not completely secure and we cannot guarantee the security of your information collected through the Website.

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). Further details of these technical safeguards for personal data collected through AIR ALSIE's websites and AIR ALSIE's mobile services facility can be informed by contacting IT@alsie.com.

If, however, a customer does not take reasonable care to ensure the continued confidentiality and accuracy of their personal 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 2).

13. Erasure and retention of personal data

AIR ALSIE A/S will retain personal data for as long as it is necessary to fulfil 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 personal data, we will take commercially reasonable and technically possible measures to make the personal information irrecoverable or irreproducible in accordance with the applicable laws.

We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. After completing the purpose, we will delete the information after 5 years unless otherwise agreed with you. We also retain personal data to the extent that it is an obligation from applicable law, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of personal data, please contact the email mentioned in section 2 of this Policy.

14. Air Alsie A/S Commitment to Children's Privacy

AIR ALSIE A/S Portal is intended for use by adults over the age of 18. Due to the nature of our service, which permits children to travel using AIR ALSIE A/S, we may collect and retain information necessary for travel, which may include personal information about children when it is required by law, aviation security regulations, or as otherwise necessary to provide services offered by AIR ALSIE A/S. AIR ALSIE A/S intends that parents or guardian provide information on children under age 13 when required. If you are a parent or legal guardian and think your child under 13 has given us information, you can call, email, or contact us in writing as indicated in this policy.

15. Data subject rights

According to the Data Protection Regulation, you have many rights concerning how we process your personal data. If you want to exercise your rights, as per below, please contact us.

Before we are able to provide, delete, or change any of your information or otherwise respond to your request to exercise your rights, we may ask that you verify your identity. We may also ask for more details to help us respond to your request. We encourage you to promptly update your personal information if it changes.

The rights include the following:

The right of access Data subjects have a right to ask for copies of the information that we process about them, including relevant additional information.

The right to rectification Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.

The right to erasure In certain circumstances data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.

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The right to restrict processing Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject has the right to have the processing of his or her personal data restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.

The right to object Data subjects have, in certain situations, a right to object to the legal processing of his or her personal data. Objection can also be to the processing of personal data for the purpose of direct marketing.

The right to data portability Data subjects have, in certain situations, a right to receive his or her personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data has been provided.

Right to complain It is important for us that you feel safe, and we will process your personal data with the utmost respect. If you still consider that AIR ALSIE is processing your personal data in an incorrect manner, you are welcome to contact us. You also have the possibility of submitting a grievance to The Danish Data Protection Authority – www.datatilsynet.dk.

More information about data subject rights can be found in the guidelines of the national data protection authorities.

If a data subject wishes to make use of his or her rights as described above, the data subject is asked to use the contact details provided at the end of this Policy.

We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.

16. Updates to this 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'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.