

# **Privacy Policy**

This Privacy Policy specifically governs the collection and treatment given to personal data you may provide to us, when accessing, browsing or using the Website features accessible via the following URL: <a href="https://www.europair.com">https://www.europair.com</a> (hereinafter, the website) or which you may have provided via other means.

By accepting this Privacy Policy, you authorise Europair Broker, S.A. (hereinafter, Europair or "we", "us", "our/ours") to process your data and include these in a record of processing activities, for which we are responsible, for the purposes outlined in this Privacy Policy.

#### Who is the personal data controller?

Titleholder: Europair Broker S.A.

Registered Address: Calle Cristóbal Bordiú 22, Local E, 28003 Madrid, Spain

Company Tax Code: A07663354
Telephone: +34 91 395 2025
Email: web@europair.es

#### How do we obtain your data?

We obtain your personal data when you request information about our services or if you request a flight via the contact form or the flight search feature on our website, when you use our mobile application, or if you contact us by email, telephone or mail.

# What personal data do we collect?

"Personal data" is understood to be any information related to you that enables us to identify you, such as your name, contact information and information regarding your access to our website.

# Specifically, we obtain the following information:

- Basic contact information such as your name, email address, telephone number
- Information regarding your use of our Website obtained by means of cookies and other tracking technologies. For more information please check our cookies policy
- Additional information required to manage the flights you have reserved, such as postal address, fiscal and payment details, requests for special services, etc.

# What do we use your personal data for?

Europair, shall process your personal data for the following purposes:

- To answer your queries: we use your information to answer your queries and your flight requests, with the aim of providing the services you have requested.
- To manage the services you have requested, i.e., to carry out all the operational and administrative processes related to your flight. These are not commercial communications and the option to stop receiving them is not available.
- Commercial communications: With your consent, on occasions we shall send you availabilities, offers and updates regarding executive and commercial aircrafts, together with news about Europair. You can unsubscribe from our commercial communications at any time by simply clicking on the unsubscribe link that you will find at the bottom of our emails or by sending an email with the subject "Unsubscribe me" to <a href="web@europair.es">web@europair.es</a>

### How long will we retain your personal data?

We shall not retain your personal data any longer than strictly required in order to fulfil the purposes for which they are being processed. In order to determine the appropriate retention period, we shall take into account the quantity, nature and confidentiality of the personal data, together with the purposes for which they are being processed.



We shall also take into account the periods during which personal data may need to be retained in order to comply with our legal obligations or to resolve queries or complaints and to protect our legal rights should any claims be filed.

In order to send you commercial communications, we shall retain your personal data while you are registered on our systems, unless you request to be removed from said systems.

### What are the legal bases for processing your personal data?

The legal basis for processing your personal data in order to contact you and respond to your flight queries and requests, and to send you commercial communications is based on the consent of users.

The legal basis for managing the way in which you contract our services is the actual contract execution.

# Will your personal data be transferred to third-parties?

Europair will not transfer your data to third parties for commercial purposes. We may communicate your data and the passengers' data to third parties involved in the operation, such as air operators, handling agents, supervisors, the police and companies in charge of security checks, among others, in order to manage the services that you have purchased. Europair will not assign your data to third parties.

#### What security measures will we implement to protect your personal data?

We follow strict security procedures when storing and processing your personal data and to protect them against accidental losses, damage or destruction. Our entire Website and the data you provide are protected by SSL technology (Secure Socket Layer). SSL is the standard industry method for encrypting personal data and credit card information, so they can be securely transferred online.

# Will your personal data be processed by other data processors?

The provision of services offered by Europair requires accommodation, storage and processing services to be contracted, among other technical services, such as software development and the maintenance thereof.

The data processing carried out by the Data Processors is governed by an agreement pursuant to which they undertake to process the data in a secure manner, in compliance with data protection laws and to ensure the data are not transferred outside the European Economic Area.

### What are your rights regarding the processing of your data?

You may revoke the consent for your data to be processed, by exercising your rights to request access to your data, to the correction or deletion of your data, to the limitation of data processing, to oppose processing and by exercising your rights to the portability of the data.

You may exercise any of these rights by contacting Europair via email by writing to <a href="web@europair.es">web@europair.es</a> or by ordinary post sent to Europair Broker, S.A., Calle Cristóbal Bordiú 22, Local E, 28003 Madrid, España, attaching an identification document and specifying the right you would like to exercise.

If you want to stop receiving our commercial communications, you can unsubscribe at any time by simply clicking on the unsubscribe link that you will find at the bottom of our emails or by sending an email with the subject "Unsubscribe me" to <a href="web@europair.es">web@europair.es</a>

You may, at any given time, submit a claim before the Spanish Data Protection Agency (www.agpd.es)

#### **Changes to the Privacy Policy**

Our Privacy Policy is subject to changes required to adapt it to new applicable laws. The changes shall be announced on our website.