

## **Privacy and Cookie Policy**

JetClass is committed to respecting your privacy and protecting your personal data.

This privacy and cookie policy explains how we collect, use, disclose and store personal information. By using our website you consent to the herein stated Privacy Policy. You can at any time withdraw your consent by sending an email to [office@jetclass.com](mailto:office@jetclass.com).

All personal data is obtained, held, and processed by JetClass, in compliance with this Policy, any and all data protection related laws and regulations that are applicable to JetClass (including without limitation Regulation (EU) 2016/679 of the European Parliament and of the Council (“GDPR”)) and any and all data protection related terms in any agreement or contract in force between you and JetClass in relation to the supply of services by us to you.

The main establishment of JetClass for purposes of the GDPR is Vienna (Austria).

Your personal data asked to be provided is to be used only in accordance with this Policy. This Policy applies to personal data about you that we collect, use and otherwise process in connection with your relationship with us as a client or potential client, including when you travel with us or use our other services, use our websites or mobile apps and book to use our services through third parties (such as travel agencies).

Your access to or use of any services provided by us and your purchase of any of our products or services is entirely voluntary. Please read this Policy carefully, as your access to or use of any services provided by us and your purchase of any of our services constitutes your acceptance to all the terms and practices described in this Policy, including without limitation the collection, use, processing, and disclosure of your personal data as described in this Policy. Please do not access or use any of our services or purchase any of our services if you disagree with any part of this Policy.

This Privacy Policy applies to this website only. Our website may contain links to other websites. Please note that we cannot exert any influence on other websites and therefore cannot be held responsible for the protection and confidentiality of the data you share when visiting such websites. When you are redirected to other websites take note of their privacy and cookie policies.

The sections below explain in more detail:

## Topics:

- **What personal information do we collect about you?**
- **What do we use the personal information for?**
- **When do we collect personal data about you?**
- **When and why do we collect ‘sensitive personal data’?**
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## **What personal information do we collect about you?**

JetClass collects, uses, discloses and stores personal information to provide you with a safe, smooth, efficient and customised travel experience to meet your needs and requirements. This privacy and cookie policy covers all personal information about you that we collect, use and otherwise process relating to your travel investigations and arrangements with JetClass as a customer or potential customer.

The personal data we collect from you includes:

- The name and contact details that you provide when you make a booking or when you register on our website [www.jetclass.com](http://www.jetclass.com) (“our website”)
- The name, title, gender, date of birth, passport details and nationality of a passenger you provide when making a booking of a flight
- Telephone number
- Email address
- Credit card information (always anonymized “xxxx xxxx xxxx 1234”)
- Your payment and address details
- Your marketing preferences, including any consents you have given us
- Your browser or device information
- IP addresses
- Personal details affecting travel (e.g meal preferences)

This personal data may include information that you provide to us directly or through companies or agents we work with, as well as information which we collect when you use our products or services.

### **What do we use the personal information for?**

The personal information is used:

- To provide travel services and other services
- To personalize travel/purchase experience
- To comply with relevant authorities such as passport control and border agencies and where appropriate relevant police and customs authorities. We may also need to contact you if we have questions regarding your request
- For the purposes of accounting and billing, immigration and customs control, health and safety, security and legal compliance
- For internal record keeping and the general administration of your records by us which may include for example, accounting and billing, auditing, credit or other payment card verification, anti-fraud screening (including the use of credit reference agency searches and payment card validation checks), immigration and customs control, safety, security, health, administrative and legal purposes and systems testing, maintenance and development
- For statistical analysis
- For our general marketing purposes where you have notified us that you consent to receive information about us and our services, products and offers
- From time to time, we may also use your personal data to contact you for feedback on our services
- To comply with any legal obligations

We collect personal information about you whenever you use our services (whether services provided directly by us or by other companies or agents acting on our behalf), when you reserve or book tickets through our system or when you use our website.

We need your assistance to ensure that your personal data is current, complete and accurate in order to provide correct booking information or flight itinerary to the appropriate customs and immigration authorities as required by law. Please contact us if any updates are necessary.

Beyond that we analyse the visits on our website with the aim to better understand our customers' needs and, based on those findings, continuously improve the online platform. To this end we save the IP addresses of our visitors' internet service providers by default. The IP address is not linked to an individual person. Within this web analysis we evaluate anonymous,

aggregated data for statistical purposes only. We use cookies and sessions to follow up on our visitors' preferences and to optimize the appearance of our websites.

### **When do we collect personal data about you?**

We collect personal data about you when you use our services or products (whether directly provided by us or by another company), when you travel with us and when you use our website, call centres or mobile applications. The following are examples of when we collect personal data about you:

- when you book or search for a flight or other products or services on our website or mobile applications
- when you book or search for a flight or other products or services through our other sales channels, such as global distribution systems
- when you travel with us
- if you complete a client survey or provide us with feedback
- if you enter a competition or register for a promotion
- if you choose to interact with us via social media, such as Facebook.

### **When and why do we collect 'sensitive personal data'?**

Certain categories of personal information, such as that about race, ethnicity, religion or health, are considered 'sensitive personal data'.

Generally, we do not ask for sensitive personal data. However, we may occasionally receive this data, because:

- you have otherwise chosen to provide such information to us (or a third party such as the travel agent through which you made your booking)
- you may have made other requests regarding your travel arrangements that may imply or suggest that you hold particular religious beliefs or have a particular medical condition

By providing any personal information that is or could be 'sensitive personal information' you explicitly give consent that we may collect, use, share with third parties and transfer it outside the European Union/EEA, as described in this Privacy and Cookie policy. If you request services by phone, you give an oral consent that we may process your personal information in order for us to provide the requested or necessary service or product to you. When ordering online or in person, JetClass will adopt an 'opt-in' policy for obtaining customer consent, where an express written consent will be sought from you when collecting your personal information e.g. signing a form or checking a box. Where you make reservations on behalf of another person, you undertake and ensure that the individual whose personal information is supplied to JetClass has

authorized the disclosure, is informed and consents to the terms and conditions of this privacy and cookie policy.

**If you withdraw your consent, it may mean we will not be able to provide all or parts of the services you have requested from us. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Please be aware that in these circumstances you will not be able to cancel or obtain a refund of any fees you have paid.**

**You may at any time withdraw your consent by contacting: [office@jetclass.com](mailto:office@jetclass.com)**

## **Minors**

JetClass cannot distinguish the age of persons who access and use our websites. If a minor (according to applicable laws) has provided us with personal information without parental or guardian consent, the parent or guardian should contact us to remove the relevant personal information and unsubscribe the minor.

## **How will we use the information about you?**

JetClass collects personal information either directly from you or from your authorised representatives (i.e. persons whom you have authorised), from third parties (e.g. your travel agent or our service provider), and other channels including our ticketing counters and airport operations, 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, facilitating internet check-in and self check-in, providing personalised services 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
- marketing and communicating with you in relation to products and services offered by JetClass or appointed agents
- contacting you for product or customer satisfaction surveys
- research and analytics purposes, including market research
- safety, security and legal compliance

The personal information is further used to provide information, news, and other business-related activities in your service.

## **Who will receive personal information about you?**

Transfer of your personal information will only be for specific purposes to provide a seamless customer experience. In order to facilitate your travel arrangements, we will often need to share your personal information to and with our subsidiaries and affiliated companies as well as third parties including other airlines and airport operators, security personnel and travel agents involved in making your travel arrangements. We also share your personal information with third parties needed to deliver services you have requested from us, such as companies that provide airport assistance or transfers.

JetClass may also disclose your personal information to law enforcement agencies and government for security, customs and immigration purposes. For example, airlines are required by laws in the United States of America and other countries to provide border control agencies with access to your booking information or flight itinerary. Accordingly, relevant personal information (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.

Your information may be transferred outside the European Union/EEA subject to the rules described in this privacy and cookie policy. In some cases, you may have to give us consent and you should be aware that the security in such cases may not be the same as in your country of origin. The transfer will be in accordance with the EU General Data Protection Regulation (GDPR).

JetClass may also use and disclose your personal data to persons who have been validly identified as being you or your authorised representative(s) 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 authorised 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.

We share your personal information with World Ticket and other technical service providers, who are providing and hosting our ticket system. The hosting is provided by Softlayer (Europe/USA/China) Itadel (Denmark).

## **How long will we keep your personal information?**

We only keep your personal data as long as it is necessary to fulfil the purpose for which it was collected e.g. to fulfill the obligations to deliver your travel services, the legal or business

purposes of JetClass, or as required by relevant laws. We will as a general rule, delete data after 5 years, unless there are specific reasons for keeping them for a longer period.

Personal data in connection with surveys, competitions etc. will be deleted within 1 month after the result has been announced.

### **What are your rights?**

You have the following rights regarding your personal data:

- access to your data
- have incorrect data corrected
- have your data deleted
- withdraw a consent
- have your data transferred to you in an accessible format
- right to raise a complaint on how we have handled your personal data, which can be done by contacting us to have the matter investigated. While such a request is in process we are restricted to use your personal information.

There may be restrictions or limitations to these rights which will be considered in the specific circumstances.

Please contact us on [office@jetclass.com](mailto:office@jetclass.com) if you want to exercise any of your rights. In certain cases, JetClass reserves the right to charge a reasonable administrative fee for this service according to applicable laws.

Please also see our Cookie Policy below.

### **Security, storage and transfer**

We are committed to ensuring that your personal data is secure at all times. We have a suitable physical, electronic and managerial procedures to safeguard and secure the personal data we collect online.

All our employees and suppliers with access to your personal data and/or who are associated with the processing of that data are contractually obliged to respect the confidentiality of your personal data. Your personal data will be stored on and processed by our systems and may also be stored on and processed by systems of a third-party data processor(s) appointed by us. The personal data that we collect from you may be transferred to and stored at a destination outside of the European Union (“EU”). It may also be processed by employees operating outside the EU

or for one of our suppliers. Such employees may be engaged in, amongst other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Policy, the GDPR, and any data protection related laws that are applicable to JetClass.

JetClass has implemented appropriate technical as well as organizational measures in order to safeguard the processing of your personal data. We have safeguards against loss or theft as well as unauthorized access and undue disclosure of personal data. Examples of technical safeguards include encryption, firewalls and Secure Socket Layer (SSL).

As an example of a procedural safeguard, JetClass has implemented various authentication procedures internally and with our external service providers that may involve us requesting various personal particulars from you in order to verify your identity before we process your request for a particular service, product or transaction. JetClass also monitors network traffic with a goal to identify unauthorised attempts to upload or change personal information, perpetuate fraudulent or illegal activities or otherwise cause damage.

If you have any concerns about security, you should contact us on [office@jetclass.com](mailto:office@jetclass.com)

## **Marketing**

We would like to send you information about products and services of ours and other companies in our group which may be of interest to you. If you have consented to receiving marketing information, you may opt out later. You have the right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the JetClass family corporation.

We don't transfer or sell your personal information to any other third parties.

## **How we use cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

The first time you land on our website you will see a box with information on cookies. If you don't accept cookies, there will be no cookies for statistics, but there will be a cookie

remembering this choice. If you don't want our website to leave any cookies at all, you will have to turn cookies off in your browser. It will then also not be possible to use any other features that require the website to remember your choices.

### **Changes to our privacy and cookie policy**

We keep our privacy and cookie policy under regular review, any updates to it will be placed on this page.

### **How to contact us**

JetClass is the data controller and you should at any time feel free to contact us if you have any questions about our privacy and cookie policy or information we hold about you:

office@jetclass.com  
Att: Privacy and Data Protection Complaints  
JetClass GmbH  
Tuchlauben 7a, 1010 Vienna  
Austria, Europe  
Commercial register number: FN 469762 b

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Austrian Data Protection Agency:

Österreichische Datenschutzbehörde

Wickenburggasse 8

1080 Vienna

Austria / Europe

Telephone: +43 1 52 152-0

E-Mail: dsb@dsb.gv.at

Further details about your rights under the GDPR can be assessed under: [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

Version

effective date

1

3rd of July 2017

2

24th of May 2018