

| Operational and compliance processing                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                            |
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| Purposes                                                                                                                                                                                                                                                                 | Legal Basis                                                                                                                                                                                                                                                                                                                                                                                | Categories of data                                                                                                                                                                                                                                                                                         |
| <b>Incident reporting and proactive safety management</b><br><br>Recording and managing incidents that may have consequences for the safety or security of Luxair flights and airport operations (Luxembourg and destinations), including those of its service providers | <b>Legitimate interest of Luxair</b> to comply with applicable safety regulations.                                                                                                                                                                                                                                                                                                         | <b>Identification data</b> (Title, name, first name)<br><br><b>Contact data:</b> address<br><br><b>Flight data:</b> flight reference, route, date, aircraft                                                                                                                                                |
| <b>Regulatory obligations: passenger assistance, traceability</b><br><br>Assisting passengers and maintaining traceability of actions taken for the passenger and/or their family in the event of an accident                                                            | Legal obligation                                                                                                                                                                                                                                                                                                                                                                           | <b>Identification data:</b> Title, name, first name<br><br><b>Contact data :</b> adresse<br><br><b>Flight and booking data:</b> flight reference, booking information, itinerary<br><br><b>Sensitive data:</b> any data necessary to provide required assistance, which may include medical condition data |
| <b>Screening of passengers against international sanctions lists</b><br><br>enforcement of travel restrictions (including refusal of booking or cancellation where a match is identified)                                                                                | <b>Legal obligation</b> to which the controller is subject (including applicable EU and international sanctions regulations)                                                                                                                                                                                                                                                               | <b>identification data:</b> name, surname, date of birth, nationality, passport/ID details)<br><br><b>booking and travel information:</b> (e.g. reservation details, flight itinerary)                                                                                                                     |
| <b>Management of flight bans</b><br><br>Flight bans imposed on disruptive passengers due to inappropriate behaviour or persistent non-payment for contracted services; enforcement of the ban for its specified duration                                                 | <b>Legitimate interest of Luxair</b> to enforce flight bans imposed on passengers who have engaged in inappropriate behaviour or failed to pay for contracted services within the agreed payment deadlines, in accordance with its general conditions and following prior notification. For its purpose, Luxair processes the data of the affected passengers for the duration of the ban. | <b>Identification data:</b> Title, name, first name, address<br><br><b>Contact data:</b> postal address, email address, phone/mobile numbers<br><br><b>Service data:</b> booking reference, flight data, nature of the incident or non-payment                                                             |

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| <b>Cooperation with authorities</b><br><br>including the transfer of information for border controls, responding to requests from authorities                                                                                                                            | <b>Legitimate interest</b> of Luxair (to comply with the regulations of the destination and departure countries under the risk of penalties) or <b>legal obligation</b> (to the extent that such an obligation applies directly to Luxair, e.g. PNR and APIs EU Directive) | All data collected by Luxair that may be required by authorities under applicable legislation                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Litigation management and debt collection</b><br><br>Management of commercial disputes with customers and partners; amicable and judicial debt recovery; defence of Luxair's legal rights; compliance with accounting and tax obligations related to receivables      | <b>Legitimate interest of Luxair</b> to safeguard its economic interest and reputation, to exercise and defend its legal rights, to prevent abuse and to comply with its accounting and tax obligations.                                                                   | <b>Identification data:</b> Title, name, first name, address, customer number<br><br><b>Contact data:</b> postal and email addresses, telephone/mobile numbers<br><br><b>Contractual:</b> purchase/booking history, subscribed services, accepted general terms and conditions<br><br><b>Billing and payment:</b> amounts due, payments received, payment delays, banking information<br><br><b>Communications:</b> emails, letters, call records<br><br><b>Judicial/litigation:</b> summonses, judgments |
| <b>IT Infrastructure and cybersecurity</b><br><br>Operation of IT and communication infrastructures, including detection, prevention, and combating of threats (including personal data protection and cybersecurity measures) and the use of data for testing purposes. | <b>Legal obligation</b> measures required by applicable regulations<br><br>Or<br><br><b>Legitimate interest of Luxair</b> to protect the company's assets and data, prevent security incidents, and maintain stakeholder trust                                             | <b>Identification data:</b> name, first name, internal identifiers<br><br><b>Connection data:</b> IP addresses, logs, session identifiers, timestamps<br><br><b>Device technical data :</b> device type, operating system, version, browser<br><br><b>Security data</b> access logs, login attempts, security alerts<br><br><b>Testing data:</b> pseudonymised or anonymised                                                                                                                              |

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| <b>GDPR obligations and regulatory compliance</b><br><br>Recording, processing and responding to GDPR rights requests<br><br>Retention period of proof of responses and compliance with statutory deadlines | Legal obligation (article 12 to 23 of the GDPR) | <b>Identification data:</b> Title, name, first name, copy of ID if necessary<br><br><b>Contact data:</b> email address, phone/mobile numbers<br><br><b>Request data:</b> type of right exercised, date, content of the request<br><br>Interaction history: proof of response, content of exchanges |
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