

Protection of personal data

Luxair, Société Luxembourgeoise de Navigation Aérienne S.A. (limited company),

a company under Luxembourg law, whose headquarters are located at 25 rue Gabriel Lippmann, L-5365 Munsbach and whose postal address is L-2987 Luxembourg, is responsible for the processing of your personal data. Luxair promises to respect your personal privacy and to protect your personal data in accordance with current law.

1. Type of personal data collected and processed by us

Luxair collects personal information regarding you when you use our services, travel with our company, consult our websites or contact our call centres and use our mobile applications. This data includes the information which you directly or indirectly communicate to us through third parties. These third parties can be companies involved in planning your travel, such as travel agencies, hotels, other airline companies or airport operators and air-line companies with whom Luxair has concluded a contract in order to supply certain services to you.

Luxair may process all the data you have directly or indirectly communicated to it and generally the following types of data:

- Information regarding your name, gender, address, telephone number, email address, nationality, date of birth, passport and visa. When you create a personal account or register, Luxair may also record your access data and other information which you have communicated through your personal account or registration form. This is the case with the MyLuxair account, for example.
- Information concerning your bookings, loyalty programmes, purchases, claims and any other complementary aid or other information requested by you regarding your travel with Luxair (for example, upgrade, extra luggage etc.).
- Information about your browsing behavior on our websites and mobile apps and information about when you click on one of our adverts, and the way you access our digital services, including operating system IP address, online identifiers and browser details;
- Information regarding your flight number, seat number, surname, first name, gender, permanent address, temporary address, email address, emergency contact information (surname, first name, city and country of residence, email address, telephone number of a person who can reach you within the next 30 days), information about your travel companions (surname, first name, seat number and age of family members under 18 travelling with you), surname, first name and group travelling with you (tour operator, team, company or other)
- You may also choose to share sensitive personal data with us regarding your health data because you have requested specific medical or other personalized assistance. In such case and if required by law, you will be requested to provide with your explicit consent in order for us to process those personal data.

2. Purposes for the processing of your personal data

Your personal data is processed for the following purposes:

2.1 Organisation of travel

The organisation of the trip includes the management of information relating to your travel, such as the flight and/or hotel booking, the subscription to an insurance, sending travel documents by post or e-mail, the boarding process, connecting flights, transfer to the hotel, the carrying out of visa checks at the airport, payment and invoicing, car rental, assistance and claims.

Moreover, this processing concerns not only communication related to the services you have booked, such as the receipt of a booking confirmation email including the personal data which you have communicated to us and the travel itinerary (this information allows us to check the accuracy of the personal data which you have communicated to us), but also the receipt of status updates and the communication of services by email or even messages relating to the organisation of your travel (for example, a delayed flight). These messages can also contain offers of options and services likely to be of interest to you, such as upgrading, extra luggage allowances etc.

2.2 Marketing information

We may process your personal data in order to supply you with marketing information through information bulletins, promotions and other advertising messages.

Please note that you can oppose the processing of your personal data for marketing purposes at any time and refuse to receive commercial communications by clicking on the link you will find at the bottom of the present document. Please note that, even if you do not wish to receive marketing information any longer, you may continue to receive other information from the service insofar as they are indispensable, for example, for confirming your booking or supplying you with updates relating to your status.

We can personalise the contents of our websites, applications, emails and other communications in order to ensure that they are relevant to you. If you have been searching for flights but have not booked or have not finalised the transaction, we may send you a reminder message by email and an offer of help relating to our services based on the flights you have consulted.

2.3 Statistical analysis and customer experience

Statistical analyses and market studies are carried out to better understand how to improve our services and to encourage our customers to make use of all our products and services. Luxair carries out statistical studies on global trends regarding the use of our services, website and mobile applications, as well as on the behaviour and preferences of our customers.

2.4 Surveys and competitions

From time to time, we organise surveys designed to better understand the way in which you use our services, in order to improve them. Your participation in these surveys is always voluntary.

From time to time, we offer our customers the possibility of participating in competitions during which they may, for example, win a prize or a gift.

2.5 Security and legal demands

We may process your personal data for purposes related to questions of security or law. We may process your personal data in order to respect legal demands such as the obligations related to immigration and customs or even obligations relating to passenger file records (PNR - Passenger Name Record) and API data (Advanced Passenger Information). As far as PNRs and APIs are concerned, some countries impose on airline companies the disclosure of passenger data before arrival in the country or before departing the country in order to assist the authorities in their fight against terrorism and against serious crimes or within the framework of compliance with local law.

For security reasons, we may archive the names of passengers who have seriously or otherwise disrupted security or public order, whether on board a Luxair plane or on land, or even in connection with a service provided by Luxair, insofar as this is necessary for the application of some regulations or internal policies.

2.6 Administrative reasons

We may process your personal data for administrative reasons, such as, for example, any claim on your part, accounting, the checking of card payment, fraud control and the maintenance of our systems.

3. Legal basis governing the processing of your personal data

The treatment of your personal data is subject to the following conditions, according to the processing operations concerned:

- 3.1 you have consented to the processing of your personal data for one or several specific purposes; or
 - 3.2 the processing is necessary for the performance of a contract to which you are a party or to undertake action at your request before the conclusion of the contract; or
 - 3.3 processing is necessary for compliance with a legal obligation to which Luxair is subject (e.g. PNR/API information); or
 - 3.4 the processing is necessary to respond to Luxair's legal interests or those of its third parties (for example, the fight against fraud, the sending of commercial information regarding Luxair services, the reinforcement of our policies or other, as specified above).
- If you do not communicate to us the required

personal data, we may not be able to supply you with all or part of the services you have requested. Please be aware that in some cases you cannot cancel or be refunded the amounts paid for the services concerned.

4. Who processes your personal data that we collected?

We may communicate your personal data to the following third parties for the purposes mentioned herein:

- travel agencies, airlines, airport operators, insurance companies, call centres, hotels or other companies necessary to provide the services you have requested;
- credit card companies and providers of fraud protection services;
- partners of the loyalty programmes you have signed up to;
- authorised authorities, agencies or administrations as required by local applicable law, such as the authorities in charge of customs and immigration or the competent authorities as regards PMR/API; and
- third parties responsible for the protection of our rights or the security of our customers, employees and assets.

5. Where is your personal data sent?

Transfer of your personal data depends on the purpose and the location of the third parties identified herein. Luxair endeavours to store and transfer your personal data as far as possible within the European Union or in other countries considered by the European Commission to present a suitable level of protection. Nevertheless, some personal data may be sent to other countries. In such cases, we ensure that such transfers are:

- necessary for the execution of a contract concluded between you and Luxair or for the application of precontractual measures taken at your request; or
- necessary for the conclusion or execution of a contract concluded in your interest between Luxair and the recipient of the data; or
- necessary for the establishment, exercise or defence of a legal action; or
- covered by agreements for the transfer of data based on standard clauses on data protection adopted by the European Commission or by a different solution in compliance with the applicable law.

6. How long is your data retained for?

Your personal data will be retained for as long as required for the purposes described in this privacy policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

The retention periods Luxair applies take into account laws and regulations which impose a specific retention period for certain categories of data, as well as CNPD recommendations regarding certain types of data processing. These retention periods can go up to 10 years. We may also archive your data until the statutory limitation periods have expired (up to 30 years in some cases), provided that this is necessary for the establishment, exercise or defence of legal claims.

7. Questions relating to your personal data

You have the right to ask Luxair for access to your data and to rectify it. Please note that should you request to have access to your personal data, given that Luxair processes a large quantity of information and within the limits prescribed by law, we may ask you, before providing the information requested, to specify the information or processing activities to which your request refers.

You also have the right, subject to specific conditions imposed by law, to request cancellation of your personal data or the limitation of processing of this data as well as the right to request portability of your personal data.

If you have consented to the processing of your personal data, you can withdraw this at any time.

You can also freely object to further processing of your personal data for marketing purposes.

For any questions relating to your personal data please include the following details:

- your name;
- your postal address (if applying by post);
- a photocopy of your passport or national identity card, so that we can verify your identity (in the case of requests sent by post);
- your signature and the date of the request;
- all email addresses (current and past) used for the booking;
- references and dates of the booking, if

applicable.

The abovementioned information must be sent to the following address:

Luxair S.A. – Data Protection Officer
25 Rue Gabriel Lippmann,
L-5365 Munsbach
Luxembourg

Postal address: L-2987 Luxembourg
or to the following email address:

data.protection@luxairgroup.lu

Luxair will begin processing your request once it has received all the information indicated above. Please note:

- any missing information will delay processing of your request; and
- within the limits of the law, Luxair reserves the right to invoice fees up to 10 euros for processing your request.

If you wish to lodge a complaint regarding the way Luxair has processed your personal data, please contact the supervisory authority in charge of data protection in Luxembourg:

Commission Nationale pour la Protection des Données
15, Boulevard du Jaz
L-4370 Belvaux