



## **Privacy Policy Wings onboard – couriers**

### **1. Who we are**

We are Wings bv, a Dutch provider of worldwide onboard couriers services, with office at Siriusdreef 1-12, 2132 WT Hoofddorp, the Netherlands.

Wings is responsible for the collection and use of your personal data described in this privacy policy.

### **2. The types of personal data we process**

We may collect and process the following categories of personal information:

#### **a. Name, passport number and other identifying information**

We may record your name, title, gender and date of birth, your nationality, country of residence and passport number.

#### **b. Your contact details and personal account or registration details**

Your contact details may include your address, telephone number and email address. When you are assigned to an onboard courier mission we may also record your sign in details and other information you fill out on your personal account or registration. For companies offering onboard courier staff we also collect information relating to your company such as company name and business location.

#### **c. Information about your reservations, bookings and purchases**

When we make a reservation, or book a flight we process your reservation and booking information. This information may include details about your flight, prices and the date of your reservation or booking.

#### **d. Information about your travel arrangements**

We process information in relation to the assignment, such as your travel itinerary, (online) check-in, your (mobile) boarding pass. We may also record any specified medical needs or dietary requests you have and any additional assistance you require.

#### **e. Our communication with you**

When you send us an email or chat with us via social media, we register your communication with us. When you call us, our customer support will register your questions or complaints in our database. We may also record telephone calls for training purposes.

#### **f. Information we collect when you use our websites, apps and other digital media**

When you visit our websites, or use one of our mobile apps, we may register your IP address, browser type, operating system, referring websites, web-browsing behavior and app use. We also collect information via cookies and similar technologies when you visit our websites or use our mobile apps. We may receive an automatic notification when you open our emails or click on a link in such emails. With your permission, we may also receive your location data. You can also agree to provide us with certain data stored on your mobile phone (such as photos and contacts).

#### **g. Information in relation to social media**

Depending on your social network settings we may receive information from your social network provider. For example, when you sign in for our services using a social network account, we may receive your social network profile including your contact details, interests and contacts. For more information on the personal data we receive from your social network provider and how to change your settings, please check the websites and privacy policy of your social network provider.



#### **h. Information you choose to share with us**

You may choose to share information with us, for example when you share your interests and preferences with us, leave a comment for us on Facebook or LinkedIn, or fill out a survey.

#### **i. Cookies and similar technologies**

When you use our websites or mobile apps we collect information via cookies and similar technologies. For more information please read our cookie policy on the websites or mobile app you use.

#### **j. Specific services, apps or events**

For specific services, apps or events, we may collect other types of data and use such data for different purposes than described in this privacy policy. We will inform you about this when you register for the specific service, event or download the specific app.

### **3. How we collect your data**

We collect the aforementioned categories of personal data in the following ways:

#### **a. We collect data you provide to us**

When we book a flight, create an (online) account, you contact our customer support or subscribe to receive mobile push notifications.

#### **b. When you use our websites or mobile apps, we collect information via cookies and similar technologies**

For more information please read our cookie policy on our websites or the mobile app you use.

#### **c. Depending on your social network settings, we may receive information from your social network provider**

Please see 'The types of personal data we process' above.

#### **d. Some information we receive from public authorities or governmental organizations.**

For example, the behavior of our courier wherever embarked or disembarked has been found unacceptable by the local or governmental or airport authorities, his or her name will be recorded by the applicable authorities. Wings bv receives the name of this person from the applicable authorities. Please see 'For which purposes we use your data' below for more information. We also share your personal information with these third parties (please see 'Disclosing or sharing data with third parties' below).

### **4. For which purposes we use your data**

#### **a. To provide our services to you.**

For example, we need your name, passport number and other identifying information to book your ticket and/or hotel accommodation. To confirm your booking and to inform you about changes in your booking, flight status, we need your contact details. And, to ensure that you receive the required care, we require your specified needs.

#### **b. To provide our online services and mobile apps to you**

Some of our online services and apps use your location. To ease your use of our online services or apps, we may analyze the data we collect when you use our digital platforms and combine it with information collected via cookies and similar technologies (please see above). For example, to understand which digital channel (email, social media) or device (desktop, tablet or mobile) you prefer, so we can restrict our communication to that channel or device.

#### **c. For statistical research**

We use automatic tools to perform statistical research into general trends regarding the use of our services, websites, apps and social media and the behavior and preferences.

**d. Categories of data.** To perform our research, we may use the categories of personal data described above, including your booking data (such as date of departure, date of arrival,



origin, destination, cabin class, and age of courier), and personal details (gender, postal code). We combine these data with the data we collect with cookies and similar technologies when you visit our websites or use our apps. And we merge it with (aggregated) data collected by third party providers using analytical or marketing cookies or similar technologies. For more information on cookies and similar technologies, please check the cookie policy on our websites. We only use aggregated data for our analysis and do not use your name or email address.

#### **e. Legal basis**

We process your personal data as described in this paragraph for our legitimate interest to develop better services and offers for our customers, to provide responsive customer support and to improve the design and content of our websites and mobile apps.

We collect, use and store your personal data to provide services to you, to comply with the legal obligations we are subject to, if necessary for our legitimate interests or the interests of a third party or on the basis of your consent.

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent. (please see 'Your rights' below).

#### **f. Linked site behavior.**

If you log on to our websites using your Wings account or if you visit our websites via a link in an email, we will link your site behavior to our data management platform.

#### **g. To communicate with you**

We use your contact details to communicate with you in relation to our services to answer your questions or to handle your complaints.

#### **h. For record keeping and to comply with statutory obligations**

We collect, store and use your data for internal business purposes, such as record keeping and to comply with our legal and fiscal obligations.

We may be required by law to collect and share your identifying information and your booking and travel information with public authorities or governmental organizations for the purpose of border control, security, immigration or entering the territory of a State.

### **5. Disclosing or sharing data with third parties**

We may disclose or share your personal data with our service providers or subcontractors for the following purposes.

#### **a. To facilitate your bookings and travel arrangements**

To handle your reservations and bookings and to fulfill our travel arrangements and purchases, we must share your personal data with other companies involved in facilitating our travel arrangements.

#### **b. For support services**

We use third parties to provide our services, such as IT suppliers, social network providers, marketing agencies, credit and charge card companies and anti-fraud screening service providers. All such third parties will be required to adequately safeguard your personal data and only process it in accordance with our instructions.

#### **c. Statistical research and direct marketing**

We may share your personal data with third parties for statistical research and direct marketing, to send you newsletters, company updates and other marketing information. Please see above 'Statistical research'.

#### **d. To secure order and safety**

We may also be required by law to collect and share your identifying information and your booking and travel information with public authorities or governmental organizations for the



purpose of border control, security, immigration or entering the territory of a State.

**e. Third party websites.**

Our websites and mobile apps may contain links to third-party websites. If you follow these links, you will exit our websites or mobile apps. This privacy policy does not apply to websites of third parties. Wings bv cannot accept liability for the use of your personal data by these third parties. Your use of these websites is at your own risk. For more information on how these third parties treat your personal information, please check their privacy policy (if available).

**f. Security and retention**

Wings bv will take appropriate technical and organizational measures to protect your personal data against loss or unlawful use.

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.

**6. International transfer of your data**

**a.** Wings bv may transfer your personal data to countries other than your country of residence (including countries outside the European Economic Area). This occurs in the course of providing your travel arrangements or because our service providers have operations in countries across the world. The laws of these countries may not afford the same level of protection to your personal data.

**b.** The transfer of personal data to countries other than your country of residence is often necessary to provide our services to you. In other cases, Wings bv ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws.

**c.** We may also be required to disclose your personal data to foreign public or government authorities. Laws in some other countries may require us to give border control agencies access to booking and travel information. Therefore, any information we hold about you and your travel arrangements may be disclosed to the customs and immigration authorities of any country in your itinerary. In addition, laws in several countries require Wings bv to collect your passport and associated information prior to travel to or from those countries. When required, we will provide this information to the relevant customs and immigration authorities. We may also disclose your personal data to government authorities if applicable law requires disclosure.

**8. Your rights**

You may contact us to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to data portability and (6) the right to object to processing.

**a. Right to access**

You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

**b. Right to rectification**



You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

#### **c. Right to erasure**

You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law and listed under article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

#### **d. Right to restriction of processing**

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

#### **e. Right to data portability**

Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible we will transmit your personal data directly to the other controller.

#### **f. Right to object.**

You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. This only applies in case the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing (see 'Legal basis' above).

At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. In case you exercise this right, we will no longer process your personal data for such purposes.

You may withdraw your consent by following the specific instructions in relation to the processing for which you provided your consent.

For more information on how you can withdraw your consent for cookies and similar technologies we use when you visit our websites or use our apps, please check the cookie policy on our websites or in the apps. There may be situations where we are entitled to deny or restrict your rights as described above. In any case, we will carefully assess whether such an exemption applies and inform you accordingly. We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply in case the personal data were not provided by you or if we process the data not on the basis of your consent or for the performance of a contract.

When you would like to exercise your rights, all you have to do is send your request to:

**Wings bv**  
Customer Service  
Siriusdreef 1-15  
2132WT Hoofddorp



The Netherlands

Email: [obc@wings-onboard.com](mailto:obc@wings-onboard.com)  
f.a.o. Customer Service

You can also contact us if you have any questions, remarks or complaints in relation to this privacy policy.

**How we look after this policy**

This privacy policy was most recently amended on 25 May 2018 and replaces earlier versions. We may amend this privacy policy from time to time and will notify you of any changes prior to these changes taking effect.