



Privacy statement Wings onboard

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, and other identifying information

For example, we may record your name, title, gender, company name and contact details.

b. Your contact details and personal account or registration details

Your contact details may include your address, telephone number and email address. When you request a quote we may also record your sign in details and other information you fill out on our quotation form. We also collect information relating to your company such as company name and business location.

c. Information about your booking

When you make a booking, we process your booking information. This information may include details about flights, any other transportation modality, fares and the date of your booking.

d. 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 request or questions or complaints in our database. We may also record telephone calls for training purposes.

e. 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.

f. 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 that 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.

g. 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 customer survey or submit an entry for a contest.



h. 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 you request a quote or book an onboard courier or contact our customer support.

b. 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.

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.

4. The main purposes for which we use your personal information

a. To provide our services to you

To handle your request and bookings we need to process most of the information described above. To confirm your booking and to inform you about changes in your booking we need your contact details.

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

Some of our online services and apps use your location, for example to show you the applicable sales offices.

To ease your use of our online services or apps, we may analyze the data we collect when you use our digital media 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 of our customers and users.

To perform our research, we may use the categories of personal data described above. 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. Without your consent, we will not use special categories of data for this statistical research. We may use customer surveys to measure customer satisfaction and to understand what is important for our customers so we can improve our service. And we use cookies and similar technologies to evaluate how our websites visitors navigate our websites so we can make it more intuitive.

d. Legal basis. We process your personal data for our legitimate interests to develop better services and offers for our customers, to provide more 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 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. You may also contact us to withdraw your consent (please see 'Your rights' below).

If you refuse to provide personal data that we require for the performance of the contract or compliance with a legal obligation, we may not be able to provide all or parts of the services you have requested from us. Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. Our legitimate interests may for example include security and safety purposes or to provide better services and offers to you. For more information on these interests, please see the 'For which purposes we use your data' above. Where we process your personal data for our legitimate interests or the interests of a third party, you have the right to object at any time on grounds relating to your particular situation (please see 'Your rights' below).

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data for statistical research (please see below 'Your rights').

e. Categories of data. We use your contact details to communicate with you. For this purpose, we may use the categories of personal data described above, including your booking data (such as date of departure, date of arrival, origin, destination). We combine this data with data that 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.

f. Opt-in and opt-out, unsubscribe and right to object. For direct marketing purposes we may send you emails with your prior opt-in. You may object to the use of your personal data for direct marketing purposes anytime (please see below 'Your rights').

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.

5. Disclosing or sharing data with third parties

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

a. To facilitate your bookings

To handle your bookings and to meet your requirements, we must share your personal data with other service providers or subcontractors.

b. For support services

We use third parties to provide our services, such as IT suppliers, social network providers, marketing agencies. 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

For statistical research and direct marketing, we may share your personal data with third parties to send you newsletters, company updates and other marketing information.



d. 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).

e. 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 booking requirements 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 will 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 government authorities access to booking information. Therefore, any information we hold about you and your arrangements may be disclosed to the customs and immigration authorities of any country in your booking. 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.

7. Your rights

You may contact Wings bv 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 have 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 app. 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.

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
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.