

Information on processing of personal information

1 Introduction

When Jettime a/s (“Jettime”, “we”, “us”, “our”) is processing personal data as a data controller in terms of GDPR (Regulation (EU) 2016/679), we are obliged to provide certain information on the processing.

In this document, you will find the information we are obliged to provide in the context of our processing of personal data about external persons (others than Jettime employees), aside from job applicants.

2 Datacontroller

The data controller is

Jettime a/s

CVR-nr.: 41410639

Amager Strandvej 390

2770 Kastrup

Telephone: +45 32 46 73 00

E-mail: legal@jettime.com

3 Processing activities

3.1 Flights and related services

We process information about passengers on flights with Jettime in order to provide air transportation on behalf of the tour operator. This includes processing to ensure that Jettime complies with its obligations towards passengers, business partners and authorities. Furthermore, the information is forming the basis for ordering of additional services, e.g., choice of seating, additional baggage, special baggage (bicycles, surfboards, etc.), extra legroom, etc.

3.1.1 Categories of personal data

We process the following categories of personal data:

- Name
- E-mail address
- Gender
- Age
- Booking number

- Flight number
- Itinerary
- Travel dates (outbound and return)
- Where required, other information necessary for our provision of the service (e.g., information on need for assistance at the airport or onboard the flight, including information on allergies and/or other health information)

We receive this information from the tour operator.

Furthermore, we process information on your purchase of additional services made directly with Jetttime, e.g., choice of seating, additional baggage or inflight meals, as well as any other information you share with us.

3.1.2 Legal basis

The legal basis for the processing of ordinary (“non-sensitive”) categories of personal data is article 6(1), para. (b) of GDPR, as the processing is necessary to fulfil a contract to which you are a party

Processing of special categories of personal data (“sensitive” data) – typically information related to your health – is based on your explicit consent. This legal basis is found in article 9(2), para. (a) of GDPR. You may withdraw your consent at any time by contacting the tour operator or us directly – our contact information can be found in section 2 above. Please be aware that withdrawal of the consent will not affect the lawfulness of processing activities carried out before the time of the consent being withdrawn, and that withdrawal of your consent may have the effect that we are unable to ensure that you receive the required assistance at the airport and onboard the flight. Furthermore, withdrawal of the consent may lead to you being denied access to the flight, if we are unable to perform the flight in a safe manner without processing the information.

3.1.3 Recipients of personal data

The information will be made available to our IT suppliers (data processors), storing the information on our behalf and processing the information in accordance with our instructions.

Furthermore, information is disclosed to handling companies in departure and destination airports, and – where required under local legislation – to relevant authorities in countries of departure and arrival.

Therefore, if your itinerary includes destinations outside EU/EEA, information will be transferred to such countries (“third countries”). The basis for this transfer is article 49(1), para. (b) or (c) of GDPR, depending on whether you have ordered your journey yourself, or if it has been ordered by others on your behalf.

3.1.4 Retention and deletion

We store the information for up to three years from completion of the flight in order to be able to handle any subsequent claims from passengers or authorities.

Information may, however, be retained for a longer period if necessary to comply with a legal obligation to which Jetttime is subject, or if retaining the information is necessary for Jetttime to establish, exercise or defend a legal claim.

3.2 Compensation for flight delays and cancellations and compensation for delayed, lost or damaged baggage

If you are seeking compensation because your flight was delayed or cancelled or because you were denied boarding, or if you are seeking compensation for delayed, lost or damaged baggage, we process personal data about you in order to handle your claim.

3.2.1 Categories of personal data

We process the following categories of personal data:

- Name
- Address
- Email address
- Telephone number
- Company information, if applicable
- Flight information (booking reference, flight number and flight date)
- Information on your claim
- Bank account number / IBAN
- For claims for compensation for flight delays or cancellations or denied boarding, the following categories of data will also be processed:
 - Information on any other person(s) on whose behalf you are seeking compensation
 - Information on any third party/-ies seeking compensation on your behalf
 - Information on any authorisation to seek compensation on behalf of others
- For claims for compensation for delayed, lost or damaged baggage, the following categories of data will also be processed:
 - Description of baggage (shape, colour, size, contents)
 - Description of damage (if applicable)
 - Delay information (if applicable)
 - Information on purchase dates and prices of items purchased by you to replace lost or damaged items
 - Insurance company information
 - Information on compensation for the same loss received from others
 - Reference number specified in the airline's report on the incident

We receive this information directly from you or from the person or other third party you have authorised to seek compensation on your behalf.

3.2.2 Legal basis

The legal basis for the processing is article 6(1), para. (c), of GDPR, as the processing is necessary in order for us to comply with our legal obligations.

As for compensation for delayed or cancelled flights or denied boarding, these legal obligations are provided by Regulation (EC) 261/2004.

As for compensation for delayed, lost or damaged baggage, the legal obligations are – depending on the specific flight – provided by:

- The Danish Air Navigation Act;
- Regulation (EC) 2027/1997 as amended by Regulation (EC) 889/2002;
- the Montreal Convention; or
- the Warsaw Convention.

3.2.3 Recipients of personal data

The information will be made available to our IT suppliers (data processors), storing the information on our behalf and processing the information in accordance with our instructions.

For compensation claims, the information may also be disclosed to insurance companies or any other party that has paid or may be obliged to pay compensation.

3.2.4 Retention and deletion

As a general rule, we retain your information for five years as from the end of the year in which the claim was finally settled.

Information may, however, be retained for a longer period if necessary to comply with a legal obligation to which Jettime is subject, or if retaining the information is necessary for Jettime to establish, exercise or defend a legal claim.

3.3 Administration

For the purpose of our general administration and business operations, we process personal information about (contact persons at) suppliers, business partners and others with whom we are interacting in the course of our business operations.

3.3.1 Categories of personal data

We process the following categories of personal data:

- Name
- E-mail address

- Telephone number
- Address
- Information on previous correspondence/business
- Other information we may receive when handling queries.

For persons who are contact persons at suppliers and business partners, information on address, telephone number and e-mail address will typically be business address, business telephone number and business e-mail address.

We generally receive the information directly from the data subjects or from the businesses, they represent.

3.3.2 Legal basis

The legal basis is article 6(1), para. (f) of GDPR, as the processing is necessary in order for us to pursue our legitimate interest in ensuring efficient and proper operations of our business, including a professional and proper handling of queries.

3.3.3 Recipients of personal data

The information will be made available to our IT suppliers (data processors), storing the information on our behalf and processing the information in accordance with our instructions.

Furthermore, we may disclose information to authorities, external advisors, insurance companies or others where this is necessary for handling the specific matter, including where such disclosure is required by law.

3.3.4 Retention and deletion

Information related to financial transactions are stored for five years from the end of the year, the transaction relates to.

Information about contact persons at businesses, as well as other persons with whom Jettime has had financial transactions, are stored for five years from the end of the year, in which the most recent transaction took place.

For other queries, information is retained for three years from the end of the year of our most recent contact with the data subject.

Information may, however, be retained for a longer period if necessary to comply with a legal obligation to which Jettime is subject, or if retaining the information is necessary for Jettime to establish, exercise or defend a legal claim.

4 Your rights

When we process personal data about you, you have the following rights:

- Access: You have the right to receive a confirmation as to whether we process personal data about you. If we do, you also have the right to receive a copy of the data we process about you along with other information about the processing.

- **Rectification:** You have the right to have incorrect or incomplete personal data about you rectified or completed.
- **Erasure:** In special circumstances, you have the right to have personal data about you erased, before the time for our ordinary erasure.
- **Restriction:** In certain cases, you have the right to restriction of processing of your personal data. If the right applies, we may then only process the data – except for retention – with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another person or for reasons of important public interest.
- **Data portability:** In certain cases, you have the right to receive a copy of the personal data you have provided in a structured commonly used and machine-readable format.
- **Object to the processing:** Where the processing is based on article 6(1), para. (f), of the GDPR (our legitimate interest), you have the right to object to the processing at any time on grounds relating to your particular situation.
- **Withdrawal of consent:** To the extent we process personal data about you on the basis of your consent, you may withdraw this consent at any time. Further information on how to withdraw your consent and about the potential consequences of withdrawing the consent may be found in the section "Legal basis" for each of the processing activities described in section 3, where consent is forming the legal basis.

If you wish to exercise your rights, please contact us at legal@jetttime.com. Your request will be processed in accordance with the legislation in force at the given time. To the extent necessary, we will contact you and ask for additional information required to handle your request correctly.

Please be aware that certain conditions and/or restrictions may apply for some of the rights; it depends on the specific circumstances relating to the processing activities. Therefore, we might not be obliged or able to fulfil your request.

If you need further information about your rights, please visit the website of the Office of the Data Protection Ombudsman, www.tietosuoja.fi.

5 Filing a complaint

You have a right at any time to file a complaint with a supervisory authority. In Finland this is the Office of the Data Protection Ombudsman, www.tietosuoja.fi.

Käyntiosoite: Lintulahdenkuja 4, 00530 Helsinki

Postiosoite: PL 800, 00531 Helsinki

A complaint may be filed by email to tietosuoja@om.fi or through the website of the the Office of the Data Protection Ombudsman www.tietosuoja.fi.

However, we encourage you to reach out to us before filing a complaint with the authorities – our contact information can be found in section 2.

6 Updates to the privacy notice

Jettime may update this privacy policy on an ongoing basis when this is necessary to provide a fair description of our processing of personal data.

In the event of material changes to our processing of your personal data already in our possession, you will be notified directly of the update (e.g. by email).

This privacy policy was last updated in October 2024.