

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 ("privacy notice"), you will find the information that 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.

Terms used in this privacy notice

Unless otherwise stated, terms defined in the GDPR, such as "**personal data**" and "**processing**", shall have the same meaning in this privacy notice.

"**Applicable Data Protection Laws**" means all legislation and regulations, including regulations issued by relevant supervisory authorities, protecting the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of personal data that from time to time applies to this privacy notice, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "**GDPR**") as well as laws and regulations supplementing the GDPR.

Accordingly, "**personal data**" means any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"**Processing**" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organizing, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2 Data controller

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

Jettime needs to comply with its obligations towards passengers on Jettime flights, including delivery of additional services, e.g., choice of seating, additional baggage, special baggage (bicycles, surfboards, etc.), extra legroom, inflight meals 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 Jettime, 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 Jettime is subject, or if retaining the information is necessary for Jettime 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.

3.4 Fulfilment of legal obligations

We process your information to fulfil legal obligations to which we are subject, e.g. to meet accounting and bookkeeping requirements.

3.4.1 Categories of personal data

We process all categories of personal data necessary to fulfil the legal obligation, such as names and transaction data.

We generally receive the information from the tour operator or directly from the data subjects or from the companies they represent.

3.4.2 Legal basis

The legal basis for processing personal data is article 6 (1) para. (c) of the GDPR, as the processing is necessary for compliance with legal obligations to which we are subject.

3.4.3 Recipients of personal data

We may transfer personal data to authorities, external advisors or others if it is necessary to comply with our legal obligations.

3.4.4 Retention and deletion

Information is stored for the period of time it is necessary, in order to fulfil a legal obligation to which Jettime is subject, for example under the Bookkeeping Act.

3.5 Establishment, exercise or defense of legal claims

We process your personal data for the establishment, exercise or defense of legal claims.

3.5.1 Categories of personal data

We process all categories of personal data necessary for the establishment, exercise or defense of legal claims, such as names.

We generally receive the information from the tour operator or directly from the data subjects or from the companies they represent.

3.5.2 Legal basis

The legal basis for processing personal data is article 9 (2) para. (f) GDPR for special categories of personal data and article 6 (1) para. (f) GDPR for other personal data, as the processing is necessary for the purposes of our legitimate interest in establishing, exercising or defending legal claims, such as in a dispute and legal proceedings.

3.5.3 Recipients of personal data

We may disclose data to authorities, external advisors or others if it is necessary for the establishment, exercise or defense of legal claims.

3.5.4 Retention and deletion

Personal data may be retained during the statutory limitation period for the purpose of establishing, exercising and defending legal claims.

4 Security

We will ensure that access to your information is adequately protected by having appropriate security measures implemented and, depending on the circumstances, taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks. To uphold this warranty, we have also implemented appropriate technical, physical and organizational measures to protect your personal data from unlawful or accidental destruction, alteration or disclosure, misuse, damage, theft or loss by accident or unauthorized access

5 Your rights

In connection with our processing of your personal data, you may, under the conditions set out below, exercise the following rights:

Access

You can request confirmation of whether or not your personal data is being processed and, if it is being processed, request access to your Personal data and additional information such as the purpose of the processing. You also have the right to receive a copy of the personal data that is processed. If the request is submitted electronically, the information will also be obtained in a commonly used electronic form unless you request otherwise.

Rectification

If you notice that personal data about you is inaccurate or incomplete, you have the right to have your personal data rectified or completed.

Object to specific processing

You can object to processing of your personal data if it is based on a legitimate interest, on grounds relating to your particular situation or if the processing takes place for direct marketing purposes. Upon such an objection, we are obliged to cease the processing, unless we can demonstrate compelling legitimate grounds to continue processing and those grounds override your interests. We may also continue processing that is necessary to establish, exercise and

defend legal claims. Processing for the purpose of direct marketing will, however, always be ceased upon your objection.

If you object to processing of your personal data, you have the right to request restriction of the processing pending our verification of whether we may continue to process it, in accordance with the below (see **Restrict processing**).

If, upon your objection, we no longer have a right to process your personal data, you have a right to have the personal data erased in accordance with the below (see **Erasure**).

Erasure

You can have your personal data erased under the following circumstances;

- If the personal data is no longer necessary in relation to the purposes for which it were collected or otherwise is processed;
- If our processing of the personal data can only be carried out based on your consent; if you withdraw such consent;
- If our processing is based on legitimate interest, you object to the processing are no overriding legitimate grounds for the processing, and if you object to the processing for direct marketing purposes;
- If your personal data has been unlawfully processed; and
- If your personal data has to be erased for compliance with a legal obligation in Union or Member State law to which we are subject.

The right to erasure does not apply when our processing of your personal data is necessary for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires the processing; or for the establishment, exercise or defense of legal claims.

Restrict processing

Under the following circumstances, you can request that we restrict the processing of your personal data to only involve the storage of your personal data;

- If you contest the accuracy of the personal data, we will restrict processing for the time required to verify its' accuracy.
- If the processing is unlawful, you may oppose the erasure of the personal data and request that its' use is instead restricted.
- If we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims, you have the right for the processing to be restricted.
- If you have objected to processing, you have a right to restriction pending the verification of whether our legitimate grounds override your interests.

We may, however, still use your personal data for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person.

Withdraw consent

To the extent that the processing of personal data is based on your consent, you always have the right to withdraw your consent. If there is no other legal ground for the processing, you have the right to have the relevant personal data erased in accordance with the above (see above **Erasure**).

Data portability

Unless it adversely would affect the rights and freedoms of others, you have the right to request a machine-readable copy of the personal data processed based on your consent or when the processing is necessary to fulfil an agreement with you as well as when personal data has been obtained from you (data portability), and to request that the information be transferred to another data controller (if possible).

If you wish to exercise your rights, please contact us at legal@jettime.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 Danish Data Protection Agency, www.datatilsynet.dk or the website of the Swedish Authority for Privacy Protection: [Swedish Authority for Privacy Protection | IMY](https://www.imy.se)

6 Filing a complaint

You have a right at any time to file a complaint with a supervisory authority.

In Sweden, this is the Swedish Authority for Privacy Protection, Box 8114, 104 20 Stockholm, Sweden. A complaint may be filed by email to imy@imy.se

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.

7 Updates to the privacy notice

Jettime may update this privacy notice 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 notice was last updated in October 2024.