

YOUR TRAVEL PAYMENT COMPANY.

AirPlus

INTERNATIONAL



Privacy Statement

AirPlus Business Partner
Due Diligence

A Privacy Statement: AirPlus Business Partner Due Diligence

According to the principles of fair and transparent data processing, it is essential to inform the person whose data is being processed about the processing itself and the purposes thereof.

Therefore, AirPlus would like to provide you with all the information required to ensure fair and transparent data processing in light of the circumstances and conditions under which AirPlus processes your personal data.

1. General Information

Lufthansa AirPlus Servicekarten GmbH, Dornhofstraße 10, 63263 Neu-Isenburg, Germany ("AirPlus") and its directly and indirectly majority-owned or controlled companies and subsidiaries attach great importance on its reputation as an ethical company with high standards of integrity and Respect for compliance with the German anti-corruption laws, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other applicable laws. In order to fulfill its obligations under these laws, AirPlus requires certain information from its potential representatives, agents, distributors, suppliers and other third parties acting as sales support ("Business Partners") in order to be able to conduct a review of the reliability of the Business Partners ("Business Partner Due Diligence").

2. Data Controller

AirPlus is responsible for the personal data collected and processed during the Business Partner Due Diligence. This includes data on the Business Partner and its employees (for example name, surname, phone number, email, etc.).

3. Data Processing Description

The purpose of the Business Partner Due Diligence is to identify and exclude corruption. AirPlus is legally required to implement safeguards to prevent money laundering and terror financing.

Corruption (active or passive) is prohibited. Corruption not only harms AirPlus, but also affects every single employee. It destroys the reputation of AirPlus and can lead to massive financial penalties. There is no place for corruption at AirPlus.

Benefits of any kind that are intended to influence decisions in an improper manner are prohibited worldwide. This applies in particular to benefits granted to employees or officials in order to positively influence a decision.

This principle is respected worldwide and is legally implemented in many countries and for all persons. The U.S. Foreign Corrupt Practices Act (FCPA) punishes acts of bribery in the USA relating in particular to foreign officials. Even minor contacts such as phone calls or e-mails can be sufficient. The U.K. Bribery Act (UKBA) also classes acts of bribery relating to both domestic and foreign officials as a criminal offense if there are links with the United Kingdom, regardless of where the crime occurred. Furthermore, in many countries (including Germany, the UK, the USA and China) the practice of targeted benefits between business partners is a punishable offense. Under these laws, offering, requesting, promising or accepting the promise of, granting or accepting a benefit intended to unduly influence an individual's own behavior or that of a business partner is prohibited.

Under the Business Partner Due Diligence, AirPlus may request data that are considered personal data ("Personal Data") under the EU General Data Protection Regulation GDPR, relating to an identified or identifiable natural person ("data subject"), e.g. key employees of the Business Partner. The collection and processing of personal data is necessary to enable the Business Partner Due Diligence. This includes for example checking the identity of a Business Partner and its key employees and matching names against official blacklists.

4. Legal Basis for the Data Processing

AirPlus processes your personal data only in accordance with applicable law, especially the GDPR.

- Corruption, fraud, embezzlement and bribery prevention is carried out in accordance with Art. 6 I (f) GDPR. Air Plus has a legitimate interest in preventing possible fraud, embezzlement and bribery scenarios and fulfill the obligations under the anti-corruption laws.
- Anti-Money-Laundering and Terror Prevention is conducted pursuant to Art. 6 I (c) GDPR (compliance with legal obligation).
- Data transfers to public authorities, when legally required, are conducted pursuant to Art. 6 I (c) GDPR (compliance with a legal obligation).

5. Data Transfers to Data Processors and Third Parties

AirPlus will forward your personal data only to fulfil the respective business purpose, if mandated by law, or to service providers which have been contracted by AirPlus and are obligated to comply with applicable data protection regulations.

AirPlus provides access to or shares your personal data with carefully selected service providers. These service providers only handle your personal data on behalf of AirPlus as so-called data processors, acting only on instructions given by AirPlus. Therefore, they are prohibited from using your data for their own business purposes.

AirPlus shares your data under strict confidentiality obligations amongst others with the following categories of service providers:

- IT service providers (hosting and infrastructure services), located in Europe
- Risk & Compliance related service providers, located in Europe

AirPlus may also disclose your personal data to trusted third parties who assist us in providing

the Business Partner Due Diligence, as long as those parties agree to keep your personal data confidential and comply with applicable data protection regulations.

In addition to that, AirPlus may disclose your personal data amongst others to the following categories of third parties:

- To external auditors in the event of audits or investigations, if there is a legal requirement or legitimate business interest to do so;
- To external lawyers in the context of legal claims, or to courts acting in their judicial capacity;
- As required by law, AirPlus may share personal data with public authorities (e.g., the German Federal Financial Supervisory Authority and/or other national Financial Market Supervisory Authorities, Financial Authorities, the German Federal Central Tax Office and/or other national Tax and investigating Authorities).
- Other compliance organizations within the Lufthansa Group.

6. Data Transfers to Third Countries

Personal Data will not be transferred to countries outside the European Union or the European Economic Area ("third countries").

7. Data Retention

AirPlus processes and saves personal data only to the extent required to fulfill the purpose for which it was collected. Personal data will be deleted once the purpose has been fulfilled, unless AirPlus has a legal obligation to retain that data (e.g. for trade or tax law requirements).

AirPlus will erase your personal data as soon as it is no longer needed for the aforementioned purposes. Personal data may also be saved for the period of time in which claims can be asserted against AirPlus.

In addition, personal data will be saved to the extent to which and for those periods of time for which AirPlus is legally required to do so. AirPlus' obligations regarding proof and retention are stipulated by local laws, including

but not limited to Germany's Commercial Code (Handelsgesetzbuch), Fiscal Code (Abgabenordnung), and Anti-Money Laundering Act (Geldwäschegesetz). According to these laws, retention periods can be up to ten years.

63263 Neu-Isenburg, Germany
dataprotection@airplus.com

8. Rights of the Data Subject

You as the data subject may assert the following statutory rights towards AirPlus: the right to obtain information pursuant to Art. 15 of the GDPR, the right to rectification pursuant to Art. 16 of the GDPR, the right to erasure pursuant to Art. 17 of the GDPR, the right to restriction of processing pursuant to Art. 18 of the GDPR, the right to object pursuant to Art. 21 of the GDPR (please refer to section "Information on your Rights to object" for further information), the right to data portability pursuant to Art. 20 of the GDPR and the right to lodge a complaint with a supervisory authority pursuant to Art. 77 of the GDPR. You can appeal in particular to the Supervisory Authority which is competent for your place of residence or your state or to the Supervisory Authority which is competent for AirPlus.

This is:

Der Hessische Beauftragte für Datenschutz
und Informationsfreiheit
Gustav-Stresemann-Ring 1
65189 Wiesbaden, Germany
Email: poststelle@datenschutz.hessen.de
Tel.: +49 611 1408 – 0

If you would like to exercise your rights as a data subject, please contact AirPlus at:

Lufthansa AirPlus Servicekarten GmbH
Data Protection Officer
Dornhofstraße 10
63263 Neu-Isenburg, Germany
dataprotection@airplus.com

9. Contact Us

If you have any questions concerning the handling of your personal data, you can contact the AirPlus Data Protection Officer at any time at:

Lufthansa AirPlus Servicekarten GmbH
Data Protection Officer
Dornhofstraße 10

B Information on your Right to Object

Right to object to Processing based on Legitimate Interest

You are entitled to object to the processing of your personal data that is based on Art. 6 I (f) of the GDPR (processing necessary for the purposes of fulfilling legitimate interests), on grounds relating to your particular situation.

Exercising your Objections

Your objection need not follow a particular form. Please direct it at:

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