

YOUR TRAVEL PAYMENT COMPANY.

AirPlus

INTERNATIONAL



Privacy Statement

AirPlus Private Card

A. Privacy Statement: AirPlus Private Card

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. Product Description

You have concluded a credit card contract with us, Lufthansa AirPlus Servicekarten GmbH, Dornhofstraße 10, 63263 Neu-Isenburg, Germany ("AirPlus"), regarding the use of the AirPlus Private Card ("Private Card"). The Private Card can be used, like any other credit card, to pay for goods and services. Additionally, you may withdraw cash from ATMs and (subject to the provision of proof of identity) at credit institutions, if there is an agreement to this option. The Private Card is intended for the use of private expenses.

2. Data Controller

AirPlus is responsible for the personal data collected and processed during the use of the Private Card. This includes all data that is collected during the transaction process, including your personal data.

3. Data Processing Description

The Private Card is personal and nontransferable. In order for AirPlus to provide its products, AirPlus will need to collect and process your personal data.

During the use of the Private Card, AirPlus collects and processes personal data necessary to enable transactions and to be able to create a structured statement for you. This data includes technical information on the transaction itself, information on the merchant where the Private Card was used, any information the merchant provides (such as the

purchased goods or services) as well as additional information provided by you. In this Privacy Statement such personal data shall be referred to separately and collectively as "Private Card Data".

Private Card Data will not be used for direct marketing purposes.

3.1. Payment Service Security

The Private Card is a credit card. This means that all information on the card itself (your name, the card number, the expiry date, the security number on the back of the card and the credit limit associated with the card) is used to verify the validity of a transaction. Whenever you use the Private Card, this information will be processed in order to approve or reject the transaction.

In order to protect you from misuse of your Private Card and from fraud, AirPlus uses automated data processing operations to determine fraudulent transactions ("Fraud Prevention"). This is done by an automated software that uses previous experience regarding fraudulent transactions as well as an analysis of your previous behavior (scoring). For example, a transaction will be declined if you use your Private Card in Europe and ten minutes later your Private Card is used in South-East Asia. AirPlus Fraud Prevention uses a tried and proven mathematical statistical model to check for fraudulent transactions.

3.2. Anti-Money-Laundering and Terror Prevention

AirPlus is legally required to implement safeguards to prevent money laundering and to prevent terror financing. This includes checking the identity of a credit card applicant (for example via video identification), matching card applicant personal data against applicable sanctions list as well as the screening of transactions.

AirPlus uses automated data processing operations to determine conspicuous transactions as required by law.

3.3. Credit Worthiness Check and Credit Limit

When you apply for a Private Card, AirPlus processes the personal data collected during the onboarding process to determine the probability, whether a Card User will meet their contractual payment obligations (Credit Worthiness Check). The Credit Worthiness Check is based on a tried and proven mathematical-statistical model.

In order to ensure an accurate determination, AirPlus may collect additional third-party information on you and process it during the Credit Worthiness Check. This information is collected from credit rating agencies and/or official sources such as banks.

Based on the outcome of the Credit Worthiness Check your application is either accepted or rejected. The result will also be used to determine the credit limit assigned to your Private Card once your application has been accepted. Additionally, the result is incorporated into the AirPlus risk management process.

Should you have any questions on the Credit Worthiness Check or the credit limit assigned to your card, please contact our customer support.

4. Legal Basis for the Data Processing

AirPlus processes your personal data only in accordance with applicable law, especially the EU General Data Protection Regulation ("GDPR").

- Private Card Data is processed pursuant to Art. 6 1 (b) GDPR (performance of a contract).
- Fraud Prevention is conducted pursuant to Art. 6 1 (f) GDPR; AirPlus has a legitimate interest to prevent fraudulent use of credit cards and to prevent Card User losses.
- The Credit Worthiness Check and the credit limit assignment are conducted pursuant to Art. 6 1 (f) GDPR

(legitimate interests); AirPlus has a legitimate interest to manage business risks that may affect all customers and to prevent Card User financial overextension.

- Anti-Money-Laundering and Terror Prevention is conducted pursuant to Art. 6 1 (c) GDPR (compliance with legal obligation).
- Data transfers to public authorities, when legally required, are conducted pursuant to Art. 6 1 (c) GDPR (compliance with a legal obligation).

5. Data Transfers to Data Processors and Third Parties

AirPlus will forward your Private Card 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.

5.1. Data Processors

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

AirPlus shares your Private Card Data under strict confidentiality obligations with the following categories of service providers:

- IT service providers (hosting and infrastructure services), located in Europe
- Transaction-related service providers (receipt processing services), located in Europe
- Customer relationship service providers (call center services), located in Europe

5.2. Third Parties

In order to provide the Private Card, Private Card Data and information on each transaction will be exchanged between all parties involved

in the relevant credit card service. This exchange of information is necessary to authorize the transaction and to pay for the purchased goods or services. The parties involved are the merchant, where the credit card is used, the acquirer of that merchant (usually their bank or service provider that provides the technical means to use a credit card), the credit card network (for example VISA or Mastercard) and the issuer (the party that provides the credit card to the individual, in this case AirPlus). This information is only used to enable the Private Card's payment functionality.

AirPlus may also disclose your Private Card Data to trusted third parties who assist us in providing the Private Card, as long as those parties agree to keep your Private Card Data confidential and comply with applicable data protection regulations.

In addition to that AirPlus may disclose your Private Card Data 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 insurance companies in case you wish to take advantage of the insurance cover available in connection with the Private Card;
- To credit agencies, insofar as it is legally required or necessary to safeguard legitimate interests and serves the execution of the contractual relationship concluded with you;
- 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 Authorities).

6. Data Transfers to Third Countries

Personal Data will be transferred to countries outside the European Union or the European Economic Area ("third countries") only to the extent required for the respective purpose (e.g. enabling transactions) or mandated by law (e.g. reporting duties stipulated by tax laws). Prior to any transfer of personal data to processors or third parties in third countries, AirPlus ensures that a transfer mechanism pursuant to GDPR is in place (e.g. the Model Clauses for the transfer of personal data to third countries provided by the European Commission). In order to receive a copy of the safeguards in place please use the contact details provided at the end of this Privacy Statement in the "Contact AirPlus" section.

7. Data Retention

AirPlus processes and saves personal data only to the extent required to fulfill the purpose for which it was collected. 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. Our 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.

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
E-Mail: 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 AirPlus

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
63263 Neu-Isenburg, Germany
dataprotection@airplus.com

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 1 (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:

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