

YOUR TRAVEL PAYMENT COMPANY.

**AirPlus**

INTERNATIONAL



## **Privacy Statement**

AirPlus Corporate Card

## A. Privacy Statement: AirPlus Corporate 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

Your employer (the "Subscriber") has entered into an agreement (the "Agreement") with AirPlus International Srl ("AirPlus"), Via della Salute 14/2, 40132 Bologna, Italy ("AirPlus"), regarding the use of the AirPlus Corporate Card and/or Office Card ("Corporate Card"). Based on the Agreement, the Subscriber provides you (the "Card User") with a Corporate Card. The Corporate 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 the Subscriber has agreed to this option. AirPlus will provide the Subscriber with all the Corporate Card expenses through a collective statement displaying additional data relating to each transaction (for example the traveler's staff ID, cost center, etc.) which is required for the Subscriber's travel expense management, procurement and/or accounting.

### 2. Data Controller

AirPlus is responsible for the personal data collected and processed during the use of the Corporate Card. This includes data on the Card User (for example name, surname, staff ID, cost center, etc.). Such data may be provided to AirPlus by the Card User directly or through the use of the Corporate Card, by Travel Service Providers (including Travel Agencies, Car Rental Agencies, etc.) or by the Subscriber.

### 3. Data Processing Description

The Corporate Card is personal and non-transferable. In order to provide the Corporate Card, AirPlus will need to collect and process your personal data.

During the use of the Corporate Card, AirPlus collects and processes personal data necessary to enable transactions, to facilitate business travel related expenses, and to be able to create a structured statement for you and the Subscriber. This includes technical information on the transaction itself, information on the merchant where the Corporate Card was used, any information the merchant provides (such as the purchased goods or services) as well as additional information provided by you or the Subscriber (such as a staff ID or a cost center). In this Privacy Statement such personal data shall be referred to separately and collectively as "Corporate Card Data".

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

#### 3.1. Important Information

The Corporate Card is a Travel Payment Service Card, intended to be used for business-related payments only. The product allows the Subscriber to expedite and facilitate travel expense management, procurement and payouts to employees.

In order to achieve that purpose, AirPlus will make Corporate Card Data, including any information attached to a particular transaction, available to the Subscriber. AirPlus is unable to distinguish between business-related and non-business-related transactions. Therefore, please take great care to only use the Corporate Card for business-related purposes.

#### 3.2. Payment Service Security

The Corporate 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 Corporate Card, this information will be processed in order to approve or reject the transaction.

In order to protect you from misuse of your Corporate 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 Corporate Card in Europe and ten minutes later your Corporate Card is used in South-East Asia. AirPlus Fraud Prevention uses a tried and proven mathematical-statistical model to check for fraudulent transactions.

### 3.3. 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 lists as well as the screening of transactions.

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

## 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").

- Corporate Card Data is processed pursuant to Art. 6 1 (f) GDPR (legitimate interests); AirPlus and the Subscriber have a legitimate interest in processing Corporate Card Data in order to deliver product functionality and expedite and facilitate travel expense management as well as procurement.
- 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.

- 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 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.

### 5.1. Data Processors

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 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 Corporate Card, Corporate 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 Corporate Card's payment functionality.

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

AirPlus transfers your personal data to the Subscriber. AirPlus does so when delivering the statement on the transactions initiated through the Corporate Card. The purpose for this transfer is to structure relevant travel management and procurement processes. The Subscriber may receive Corporate Card Data in a digital format that enables the Subscriber to further process Corporate Card Data on their own IT systems.

In addition to that, AirPlus may disclose your personal 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 and/or the Subscriber wish to take advantage of the insurance cover available in connection with the Corporate Card;
- 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., Banca d'Italia and the other relevant national Authorities).

### 5.3. Corporate Discount Agreements

If and when the Subscriber has entered into a corporate discount agreement with airlines or into other agreements with brokers between travel agencies and airlines, AirPlus may

transmit Corporate Card Data to the Subscriber's contracting partners. AirPlus may also transmit aggregated Corporate Card Data to facilitate contract and discount negotiations.

### 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 reports to Subscribers) 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. Sources of Personal Data and Categories of Personal Data

AirPlus does not collect all Corporate Card Data from you directly but receives your personal data from third parties (in particular the Subscriber and Travel Service Providers).

- The Subscriber may provide AirPlus with the following categories of data: The Subscriber's name and address, your name, your staff ID and cost center, and/or other additional information to facilitate travel expense management and/or purchasing such as an internal process number.
- Travel Service Providers may provide AirPlus with the following categories of data: The Subscriber's name and address, your name, your staff ID number and cost center, and/or other additional information such as airline ticket numbers or car rental details to facilitate the Subscriber's travel expense management.

### 8. 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 the Italian Commercial Code, Fiscal Code and Anti-Money Laundering regulation. According to these laws, retention periods can be up to 10 years.

#### 9. 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:

Garante per la protezione dei dati personali  
Piazza Venezia n. 11 - 00187 Roma  
Tel.: (+39) 06.696771  
Fax: (+39) 06.69677.3785  
Mail: [protocollo@gpdp.it](mailto:protocollo@gpdp.it)  
Certified mail: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it)

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

AirPlus International Srl  
Data Protection Officer

Via Della Salute 14/2  
40132 Bologna (BO), Italia  
[protezionedati@airplus.com](mailto:protezionedati@airplus.com)

#### 10. 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:

AirPlus International Srl  
Data Protection Officer  
Via Della Salute 14/2  
40132 Bologna (BO), Italia  
[protezionedati@airplus.com](mailto:protezionedati@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:

AirPlus International Srl  
Data Protection Officer  
Via Della Salute 14/2  
40132 Bologna (BO), Italia  
[protezionedati@airplus.com](mailto:protezionedati@airplus.com)