



## *Blue Bird Airways*

### **PRIVACY NOTICE**

**Blue Bird Airways SA** a company incorporated in Greece, under registration number 77700527000, whereas its registered office is at International Airport Nikos Kazantzakis P.O. BOX 37 71601 Heraklion Crete Greece.

When you use Blue Bird Airways ('BBA' 'we' or 'us' or 'our') services, notably those available on the website mobile site or mobile apps, BBA who is responsible for handling data, may collect and process your personal data. BBA is committed to adhering to the regulations concerning the privacy and data security of its passengers, potential customers, visitors, vendors and users of its websites or/and application. All data collected through the BBA websites is processed in accordance with all local applicable legislation and the terms and conditions laid out by the EU Regulation for the General Data Protection Act (EU regulation 2016/679) or "GDPR".

This Privacy Notice informs you about how the data collected from you when you use BBA services and/or our sites or send a request or a mail or an appeal on any subject etc is being used. By collecting this information, we are acting as a data controller and as responsible for the same, this Privacy Notice provides you with information about us, your rights and our obligations and explains why and how we use your data..

To ensure the proper application of this regulation, BBA has appointed a Data Protection Officer who serves as the official liaison to the Greek Data Protection Authority.

We will answer any questions you have and provide you with any clarification needed, subject to legal limitations. For any further questions related to this policy or the way in which BBA processes your personal data, please contact our Data Protection Officer at the following e-mail address: [dpo@bluebirdair.com](mailto:dpo@bluebirdair.com) or by Postal address Heraklion International Airport P.O Box 37, 71601 Heraklion Crete Greece Attention Data Protection Officer or by telephone on (+30) 2810336326. Any enquiries about our use of your personal data should be addressed to the contact details above.



## **How we collect your data**

When you use BBA services, we receive your data through different channels, whilst you are browsing, buying or booking online, when you complete an online form, when you apply for a job position, when you make contact with BBA or when you send your data to us in any other way- in some cases you actively submit information to us, in some cases we receive information from third parties and in some cases we receive information by observing your uses of our services.

## **What personal data do we collect:**

We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services.

*The personal data that may we collect from you is:*

- Information collected for the purpose of reserving flight tickets –includes Identity Data (Name , Date of Birth, Home Address and nationality ,Personal Email ,Contact Telephone Number ,Mobile Telephone Number ,Passport/ ID Number), details of accompanying passengers on the flight and other personal preferences (baggage, seat allocation, destination etc).Payment information includes payment card details and bank account. Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences. Information gathered when applying for a position in BBA includes personal details ( name, ID number, date of birth, gender, home address, CV documents, data about your education and experience, languages spoken ) and contact details ( telephone number, email address).

## **Purpose for data processing and legal grounds (Legal Basis for Processing):**

Your personal data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.



Your personal data is primarily used to enable you book and purchase tickets and for us to provide specific services: transportation, market research, creating customer loyalty, activities, sales information, satisfaction surveys, new products and services designed to improve customer experience in the airport or during a flight, recruitment, customer service, handling customer requests and/or complaints, but also to ensure flight safety and security and to combat fraud.

We will not disclose or share your data without your consent; unless required to do so by law.

It is necessary for us to collect your data for the aforementioned purposes:

- To enable the fulfillment of the transport contract
- To comply with a legal obligation (notably to ensure flight safety, carry out the mandatory immigration processes in conjunction with foreign public authorities, tax purposes, business accounting).
- For legitimate purposes in the interest of BBA (to develop new services and products, improve customer services).

Any incident that occurs during the fulfillment of the transport contract and liable to compromise the safety or security of a flight may be recorded and kept on file, be subject to a filed complaint, and result in a travel ban on flights provided by BBA for a duration of 3 years.

We may use cookies to remember your preferences when you have visited our site and pages you regularly visit and to ensure that you receive the most up to date information which is relevant to you. We also use cookies for internal management purposes and to enable essential activity to ensure that your account works correctly when accessing our services. We will not use these cookies to store information such as account details or transaction history.

Our website access logs are only collected for tracking visits to our site for statistical and performance optimization purposes and to assist should any visitor, including you, not be able to access websites.



With your choice to submit personal information to us by means of the site, by means of any of the ways designated in this notice, you declare and obligate as follows:

A. The personal information that you submit us is correct, complete, accurate and belongs to you.

B. The personal information will be retained in the company's data stores, and we will be entitled to make use of it, and to transfer it to third parties acting on our behalf or in cooperation with us, according to the conditions set out in this privacy notice.

**Personal information about you that is collected or obtained from third parties:**

In some cases, we may receive information about you from third parties, such as when you make reservations for flight tickets or other company products or services through other airlines, travel agents, or another person. Whenever you make a reservation as noted above for another subject of information, you are obligated to draw his attention to the fact that you are going to submit information about him to us, and to draw his attention to this notice. Regarding other users – you hereby declare and confirm that: (a) You are authorized and empowered by law to submit personal information about another subject of information to us, that the said submission of personal information to the company and its use of it (and/or by someone on its behalf) as detailed in this notice does not impinge on the rights of any third party, including the privacy of the other subject of information; and that (b) the other subject of information confirmed and gave his explicit agreement to what is stated in this privacy notice. Insofar as it is not possible to obtain his consent, you hereby declare and confirm that you are authorized to confirm this notice in his name and for him.

**Personal data concerning minors:**

We do not knowingly collect any information from anyone under the age of 18 years, apart from the data for reservation and ticketing purposes and subject to prior consent from his or her parents or legal guardian. Our website, products and



services are all directed to people who are at least 18 years old or older. If you are under 18, do not use or provide any information on this website or on or through any of its features / register on the website, make any purchases through the website or provide any information about yourself to us, including your name, address, telephone number or email address. If you believe we might have any information from or about a child under 18 (apart from the data for reservation and ticketing purposes), please contact us. We have the right to demand information and proof from you about your age.

### **IT security/ Secure transactions**

BBA is committed to ensuring the security and privacy of the personal data that you provide us. We implement necessary technical and organizational measures, with regards to the nature, impact and context of the personal data that you share with us and the risks involved in processing it, in order to protect your personal data.

Everyone has a part to play in data security and privacy. For this reason, we recommend that you avoid communicating passwords to others, and that you log out of your BBA and social media accounts (especially if these accounts are linked) and close your browser window when leaving the BBA website, especially when using a public device to access the internet. This way, other users will not be able to access your personal information.

We strongly advise against communicating any document issued by BBA that contains your personal details (boarding pass, ticket number, etc.) to third parties or posting such documents on social media.

Finally, BBA has implemented a procedure specifically designed to manage security breaches which allow us to intercept any data breaches, notify the relevant authorities and alert you to the fact that your personal data may have been affected.

### **Exercise of privacy rights:**



As outlined in the respective legislation, you have the right to view, change, delete, or contest any data pertaining to you, as well as to limit, withdraw and refuse the transmission of your personal data.

Furthermore, you have the legal right to decide what happens to your personal data in the case of death.

Moreover, any person under the age of 18 at the time the personal data was collected may request that the data be deleted at the earliest opportunity.

Requests to exercise this right must be addressed to the contact information provided above.

Please provide details including your full name and e-mail address in order for us to be able to identify you, as well as any other relevant information to confirm your identity.

You also have the right to receive help from the Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) in the event of a violation of the regulations regarding Personal Data and, more specifically, the GDPR. We would, however, appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance using the contact details above.

We will take action whenever necessary to guarantee your rights, or respond to any questions or complaints.

When you contact our customer service department, your call may be recorded in order for us to improve our service, and to avoid any legal disputes or malicious calls. If you do not wish to be recorded, please inform the agent at the start of the conversation.

You also have the right to refuse for your data to be collected for marketing purposes. When required by law, personal data will only be used for online marketing once your express consent has been obtained.

The provision of certain services is dependent upon the collection of personal data (special meals, medical assistance, etc.). You can, of course, exercise the right to oppose the use of this personal data, but you may not be able to benefit from these services as a result.

As stipulated by Greek and international laws and regulations, failure to provide data or providing incorrect data may result in you being stopped from boarding or



refused entry into a foreign country (upon decision by customs authorities, for example), in which case BBA cannot be held responsible.

### **Sharing and Disclosing Your Personal Information:**

In particular and in order to facilitate your travel arrangements, we will often need to share your personal data with third parties such as airlines, airport operators, airport authorities, reservation and payment administration and additional organizations that deal with your travel arrangement. We also share your personal data with third parties who deliver services either to you or to us, such as companies that provide IT services, legal advisers, accountants, suppliers of payment services etc.

In addition we might forward personal information about you to the company's business partners in order to make accessible a wide variety of solutions of possible interest to you. In such case we may offer you products and services of third parties that are the company's business partners. If you express any interest in these offers, we may send personal information about you to those third parties. As stated above, you have the right to withdraw your consent and in this case we will not forward the information to those mentioned partners.

As outlined by Greek and international laws and regulations, BBA, as well as any other airline, may be required to communicate personal data to authorized local authorities (customs, immigration, police, etc.) both in Greece and overseas.

Please note that in these specific cases, BBA has put in place appropriate technical and organizational measures in order to ensure a sufficiently high level of security in relation to the inherent risk involved in data processing and in addition requires its subcontractors (service providers, suppliers, etc.) implement the same level of data protection

Despite the above, transferring information through the internet is not completely safe. Accordingly, we cannot assure the security of the data transferred to our site, including the security of personal information about you that is transferred to us, but we make all efforts to adhering to all principles related to data protection, and more specifically, pertaining to users' rights, the duration of time that data is stored, as well as obligations regarding the transfer of personal data.



### **Links to Third Party Websites:**

Some pages on the BBA website contain links to access the websites of other companies. We recommend that you read the data privacy policies of these non-BBA websites, as these terms may vary from those on the BBA website. BBA is not responsible for the use of your personal data on these external websites.

### **Transfers outside the EU:**

Some of the parties mentioned above may be located outside the European Union and have access to all or some of the personal data collected by BBA (name, passport number and details, trip details, etc.) in order to fulfill the transport contract or comply with specific legal requirements - which means that we may transfer any information which is submitted by you through the website for the below purposes:

Website hosting, email servers, file servers, payment administration, reservation and ticketing administration etc.

Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information.

With your use of our Sites, and the submission of personal information to us, you thereby give your informed consent to transfer and/or retain and/or store and/or process personal information outside the EU.

### **Consequences of Not Providing Your Data:**

You are not obligated to provide your personal information to us however, this information is required for us to provide you with our services and we will not be able to offer our services without it. Following are details about these cases:

Certain legislative directions that apply to us or contractual obligations require it to gather certain types of personal information as a condition for providing its service or product. In these cases, if you do not submit the information to us, we will be unable to provide you with the service or product that you requested.

For example, in the flight ticket reservation procedure, we require you to submit to us your email address so that we can send you the electronic flight ticket you ordered. If as part of the flight reservation you do not submit your email address to us for sending the e-ticket, we cannot complete your reservation.



### **Time period of data storage:**

BBA is committed to storing your personal data no longer than necessary for the purpose for which it was processed. Furthermore, BBA stores your personal data in accordance with the retention period imposed by current regulations.

This retention period depends on the purpose for which the data is being processed by BBA and takes into account regulations which impose a specific retention period for certain categories of data, possible time limits as well as legislative recommendations regarding certain types of data processing.

BBA reserves the right to alter its Privacy Notice at any time. We recommend that you check the latest version of the policy on a regular basis. The current version is dated on 8<sup>th</sup> October 2018.