

**Information on Data Privacy for myIDTravel and myDutyTrip customers
according to the General Data Protection Regulation (GDPR),
valid from 25th May 2018**

V1.0 May 2018

Lufthansa Industry Solutions GmbH & Co. KG, Lufthansa Industry Solutions BS GmbH, Lufthansa Industry Solutions AS GmbH and Lufthansa Industry Solutions TS GmbH (hereinafter “We” or “Us”) herewith inform about the processing, storage, transfer and deletion of personal data within the applications myIDTravel and myDutyTrip in accordance with legal requirements based on the General Data Protection Regulation (GDPR), valid from 25th May 2018.

1. We respect your privacy

The protection of your privacy when processing personal data and the security of all business data is an important concern for us, which we take into consideration in our business processes. Data protection and information security are integral parts of our corporate responsibility.

Our employees and the service providers appointed by us are obliged to observe confidentiality and to comply with the applicable data protection laws. We shall take all the necessary technical and organizational measures to ensure an appropriate level of protection and to protect the data handled by us, especially from the risks of unintended or unlawful destruction, manipulation, loss, alteration, unauthorized disclosure or unauthorized access. Our security measures are continuously improved in line with technological developments.

2. Collection, processing, storage and usage of personal data

Personal data is any information that relates to an identified or identifiable natural person, including e.g. names, contact data, flight and ticket data.

With the usage of the myIDTravel and myDutyTrip website the myIDTravel and myDutyTrip user as well as all persons entitled to travel and which are registered within the user accounts you accept the processing of your personal data and assure that their personal data may be transferred to the respective parties (see 3. Transfer of personal data) with the purpose of carrying out the booking of travel services or for any other legal purpose.

Furthermore the processing includes to forward personal data to so-called third countries. In this case, before transfer, we shall ensure that the beneficiary is adequately protected. We also inform that no automated individual decision-making, included profiling according to Art. 22 DSGVO is used by myIDTravel and myDutyTrip based on the available personal data.

Purpose of the personal data processing

We and the service providers commissioned by us will process your personal data for the purpose of carrying out the booking of travel services based on the contract with myIDTravel and myDutyTrip customers.

Categories of processed personal data

If the personal data is not provided from the data subject itself (e.g. by typing the data into the screen for carrying out a booking), the source of personal data is provided by the employing company (e.g. by HR systems) or by the myIDTravel and myDutyTrip website during the processing of your booking.

Every time you use the myIDTravel and myDutyTrip website, your Internet browser automatically transmits certain information, which we store in so-called log files.

The following data categories are processed within myIDTravel and myDutyTrip:

- Address and Contact data (e.g. Names, Phone Numbers, E-mail addresses)
- Staff / Employee Profile data (Last login, Last change, encrypted Password)
- Flight data and history (e.g. Arrival/Departure date, Compartment, Origin/Destination)
- Ticket data (e.g. Ticket Number, Creation Date, Price/Fares/Taxes)
- Staff / Employee Data (e.g. Cost Center, Date of Joining, Family Status, Gender)
- Traveler data (e.g. Employee ID, Date of Birth, Name, Salutation, Title)
- Entitled persons data (e.g. Creation/Deletion Date, Date of Birth, Form of Identification)
- Calculated Fringe Benefit (GWV) (e.g. Current Fare, Current Tax, Current Routing, Currency)
- System related information (e.g. IP addresses, URLs, Internet browser)

Recipients to whom the personal data is disclosed

- myIDTravel and myDutyTrip Team
- Service Providers commissioned by us
- Payment Service Providers
- Global Distribution Systems (GDS)
- Ticketing Airlines
- Employing Airlines
- Legal authorities (if required by law)

3. Transfer of personal data

Transfer to other responsible parties

Your personal data will only be transferred by us to other responsible contracting parties within the Lufthansa Group (third parties) involved in the provision of the service, as this is necessary for the fulfillment of the contract. We or the third party have a legitimate interest in the transfer or you have granted your consent by using the myIDTravel and myDutyTrip website. All service providers are bound by us to maintain confidentiality and comply with the legal requirements.

In addition, data can also be transferred to other responsible parties, if we are obliged to do so by law or by enforceable administrative or judicial order.

Transfer to Payment Service Providers

Your personal data will be transferred by us to the respective payment service provider commissioned by our customers as their contracting parties. The payment service providers (Wirecard, Igeni-

co and others) also collect and process some of this data as responsible parties, involved in the provision of the service, on behalf of our customers.

Transfer to Global Distribution Systems (GDS)

Your personal data will be transferred by us to the respective Global Distribution System (GDS) commissioned by our customers as their contracting parties. The GDSs (Amadeus, Sabre and others) also collect and process some of this data as responsible parties, involved in the provision of the service, on behalf of our customers.

Transfer to Airline Systems

Your personal data will be transferred by us to the respective Airline System commissioned by our customers as their contracting parties or operated by our customers. The Airline System also collect and process some of this data as responsible parties, involved in the provision of the service, on behalf of our customers.

Transfer to Travel providers such as providers of hotels and rental cars

Your personal data will be transferred by us to the respective travel provider such as providers of hotels and rental cars commissioned by our customers as their contracting parties. The travel provider (Expedia and others) also collect and process some of this data as responsible parties, involved in the provision of the service, on behalf of our customers.

4. Duration of storage and retention periods

Period for which the personal data is stored and the criteria used to determine that period

We shall store your data as long as necessary for the provision of the service or while we have a legitimate interest in continued storage. For reporting purposes and for the contract management the personal data is stored for a timeframe exceeding the period of travel. In all other cases, we will delete your personal data, with the exception of the data that we are required to retain in order to comply with legal obligations. Maximum storage time is within the respective claim and legal retention period of 10 years.

The log files are stored by us and our service provider for a short period of time (90 days) for the purpose of identifying malfunctions and for security purposes (e.g. to investigate attempted attacks). Log files that need to be retained for documentation purposes are excluded from the deletion process until the final clarification of the relevant incident and may be shared with investigative bodies on a case-by-case basis.

5. User rights

You as myIDTravel and myDutyTrip user as well as all persons entitled to travel and which are registered within your account have the right to request information about the processing of your, respectively their personal data. You may ask for a rectification or erasure of your personal data. (This does not apply to data required for billing and accounting purposes or subject to statutory retention.) You may restrict or object to the processing of your personal data, provided the legal requirements are fulfilled.

To assert your rights, any kind of request for information, rectification, erasure, restriction or objection is to be made via your employing company (Staff Travel Manager). Please ensure that the employing company can clearly identify you or the requesting person, which is entitled to travel or has been registered by you.

Only in case your request has been forwarded by your employing company to the myIDTravel and myDutyTrip Team at Lufthansa Industry Solutions, we see ourselves in the duty to act.

Please note that in case of a restriction or objection to the processing of personal data, the right to travel and the right to use the myIDTravel and myDutyTrip website and their services are suspended for all myIDTravel and myDutyTrip users as well as for all persons entitled to travel and which are registered within this account.