

# Privacy Policy of CitizenPlane

We at CitizenPlane take your privacy very seriously. Currently, for our customers in the EU, we comply with the Regulation No. 2016/679, the General Data Protection Regulation, also known as GDPR, which sets the highest privacy and data protection standard in the world.

For our customers in the rest of the world, we will try our best to uphold the same level of data protection based on the principles of the security (confidentiality and integrity), transparency, data minimisation, purpose limitation, accuracy and storage limitation.

However, we cannot always guarantee the same treatment to all our customers outside of the EU with regards to their rights as data subjects. For example, if we are overloaded by requests from our EU customers, which we absolutely must comply with, we might be forced to refuse some requests from Third Countries.

In this Privacy Policy we explain what data we collect from you, why we collect it, how we use it and with whom we might share it. It also explains what rights you as a data subject have and how you can fulfil them.

This Privacy Policy applies to any data processing done by us in connection to your use of our services, through our website CitizenPlane.com.

## Who are we and how can you contact us?

We, as the Data Controller, are the company CITIZENPLANE, a French société par actions simplifiée, having its registered office at 32 rue de Paradis - 75010 Paris, registered with the French registry (Registre du Commerce et des Sociétés) under number 834 261 380.

For all matters concerning privacy and data protection or to exercise your rights under the GDPR, you can always contact us through this email: [support@citizenplane.com](mailto:support@citizenplane.com).

## Some terms that we use in this Privacy Policy

**Personal Data:** any information relating to a directly or indirectly identified or identifiable natural person. That means that if we possess means to identify either you or even the device you're using, any information that we can connect to you will be treated as Personal Data.

**Data Controller:** someone that determines the purposes and means of processing Personal Data. For example, we are a Data Controller when we process your Personal Data for the purposes stated in this Privacy Policy. If you choose to book a ticket through our website, we will be sending your Personal Data to another Data Controller – the air carrier or the provider of other services – who will again use your Personal Data for its own purposes. Each Data Controller (to whom the GDPR or similar legal regime applies) should have a Privacy Policy

such as this one where you can learn about how your Personal Data is processed. You can see the full list of Data Controllers we might share the data with below.

**Data Processor:** a third party that only helps to achieve the purposes determined by the Data Controller. For example, we as a Data Controller use many third-party services to which we outsource some parts of our activities that we don't do ourselves for various reasons such as cost efficiency. A Data Processor is only allowed to process your Personal Data according to our documented instructions, and the GDPR obliges us to have a strict formal contractual relationship that ensures a truly sufficient protection of your privacy.

**Third Countries:** countries in which the GDPR regime is not applicable. Currently, by Third Countries we mean all countries that lie outside of the European Union.

## What Personal Data we collect?

For every purpose for which we need your Personal Data, we only process data that are necessary for us to fulfil it. Depending on the given purpose, we may process:

### Your identification information

Mainly your name, surname, nationality, IP address, ID number, and other identification information that you might give us. Additionally, we will assign you some unique identifiers for our use, such as the booking ID or, in some cases, unique promotional codes.

### Your contact details

Your email address, phone number and other contact details that you might give us in non-standard situations.

### Your settings

We will remember what choices you make so that we can apply the same settings when you come back to us. If, for example, you decide to opt-out of using cookies for some reason, we will try to remember that and make sure we don't store those cookies during your next visit to our website.

### What you've ordered

We will gather data about the order itself and its payment and we will keep your past orders for the purposes of the Provision of our services, and to a limited extent, for Marketing purposes also (we will never use any data about your payment for Marketing purposes).

## What you did on our website

When you use our website, we track what you do on it and use this for the purposes of Improving our services. For example, we monitor which pages you visit, what you click on or where your cursor is, and based on this, we analyse if certain features on our website need improvement. Also, we remember some info that you fill into our booking forms for the purpose of reminding you that the order wasn't actually completed as a part of the purpose of Sending personalized offers.

## Info that we need to make our offers relevant to you

If you book a flight or order other service, we will gather some data about you so that we can tailor our offers just for you and your needs. This includes information about your device (software and hardware), your IP address, general information about your location (such as timezone or general area), identification and contact information.

## Information that we collect when you contact us (if you ever contact us)

When you send us email, contact us through chat or when you call us, we will store your contact details, booking ID and all the information that you give us during the contact, including the messages or the call itself. We will then use it to:

1. Solve your problem as a part of our customer support
2. Train our customer support staff
3. The establishment, exercise or defending of a potential legal claim

## For what purposes we use your Personal Data?

### Provision of our services

#### Searching and booking of flights and related services

The main reason we collect and use your Personal Data is to conclude an agreement with you and then to provide you the services that you've ordered. Depending on the extent in which you use our services, we will process your Personal Data in a way that is necessary to enter into and fulfil our Service Agreement as described in Article 2 of our Terms & Conditions. The services that we provide include, primarily, the brokering of an air carriage contract and related services between you and the selected carrier.

To achieve this purpose, we need to share your Personal Data with the air carriers with whom you will enter into an air carriage contract and in some cases also with the providers of the Global Distribution Network.

If you order additional service Special assistance or when you ask us to get a refund due to health issues, we will process your Personal Data concerning health and in case of the Special assistance service, we will share it with the air carrier of your choice. During the ordering process, you will be asked to give your explicit consent with the processing of this Personal Data. You can always withdraw your consent through this email: [support@citizenplane.com](mailto:support@citizenplane.com). However, please note, that if you withdraw the consent with the processing of your personal data for the purpose of the Special Assistance additional service, we won't be able to provide you with any subsequent support related to this service.

### Ordering other services

It may also happen that you choose to order another service that we or our partners offer on our website, such as insurance or accommodation. We will process your Personal Data that is required to enter into a contract with you, to provide you with the ordered service and (if the service is provided by our partner) to do our part in the contractual relationship between you and the third-party service provider. This will include the transfer of your data to this third-party service provider. You can find the complete list of third-party Data Controllers that we might share your data with [here](#).

As with the previous example, we are allowed to process your Personal Data for this purpose based on a legal ground of necessity for conclusion or performance of a contract.

### Customer support

Customer support is a huge part of our services. We will record all of our communication through all channels, such as email, chat and phone calls, in order to provide you with the service that you require.

Again, we are legally allowed to process your Personal Data for this purpose based on a necessity for the conclusion or performance of a contract.

### User account

If you want to register a CitizenPlane account, we need to process your Personal Data such as your email address, password and other information necessary to provide you with this service. We are legally allowed to this based on a necessity for the conclusion or performance of a contract.

### Fraud prevention

When you book a flight or order any other service through our website or app, during the payment transaction, we use a third-party service that helps us prevent fraudulent behaviour. This is a very common process that happens nearly every time you order something online. For this to be possible, we will transfer your Personal Data momentarily to a third-party Data

Processor. However, this is not something to worry about, the whole transaction is completely secure, and we use one of the best and most common fraud-prevention tools. You can learn more about the Data Processors we use here. Furthermore, to prevent attempts for fraudulent chargebacks, if you report fraudulent purchase through your bank, we might check your social media to see, whether you have some sort of connection to the person who ordered the ticket to make sure that it is not an attempt to get the money for the ticket back by fraud. We shall only process limited information about your connection to the person, who ordered the ticket, and whether you by any chance haven't published some information connected to the flight (e.g. photos from the airport taking the flight).

We need to prevent fraudulent behavior to protect our business and our property. This protection against fraud is one of the strongest legitimate interests recognized within the EU. Therefore, we process your personal data for this process on the legal ground of the legitimate interest.

## Marketing purposes

### Sending personalized offers

To provide you with the best offers and to maximise our marketing efficiency, we process your Personal Data for the purposes of direct marketing (email offers and related processing activities). Besides your contact details, we also keep data like your transaction history, flight preferences and other data about your interaction with us that help us with customer segmentation and personalisation of these offers. For example, we might tailor a special offer just for you based on your previous orders.

Additionally, when you provide your information during the booking process or while ordering another service, we may send you an email to remind you of any unfinished orders that are still incomplete. We will only keep your Personal Data collected in this way for 30 days.

We can send you offers and other commercial communications based on a legitimate interest in direct marketing. At any time, you can object to this and we will immediately cease to process your Personal Data for this purpose. However, this means that we will no longer be able to send you any offers.

We will never share your contact details with other Data Controllers without your knowledge and we will only contact you with offers that are linked to our main business. You can always unsubscribe and check your subscription status through the links below every newsletter that you get from us.

### Marketing Analytics

To improve our marketing campaigns in general, we also perform analysis to help us see which campaigns work and how they contribute to our conversion rates. To secure the maximum effectiveness and best outcomes of such analysis, we use third-party Data Processors. You can see the full list of third parties that we use and therefore share your

Personal Data with here. In all cases, we remain the Data Controllers of your Personal Data and these third parties can only use them to fulfill our purposes.

For this purpose, we also process your Personal Data based on our legitimate interest of market research. At any time, you can object against this processing. We will then assess whether we can prove that our legitimate grounds for the processing override your individual interests, rights and freedoms. If not, we will cease to process your Personal Data for this purpose.

### Ads, notifications and banners on CitizenPlane and third-party websites

We want to make sure that you don't miss out any special offers that we have. Because of this, we send website and app push notifications (with your consent) and we also display ads on CitizenPlane and third-party websites that are tailored for you according to your past orders. It might therefore happen that you'll see ads offering booking of flights on CitizenPlane elsewhere on the internet.

We can send you notifications and display ads based on our legitimate interest in direct marketing. At any time, you can object and we will immediately cease to process your Personal Data for this purpose.

## Improving our services

### Improvement and development of our website and services

As with any other business, to improve the way we do things, we need some data about you, our customers. To this end we use third-party services that allow us to record and analyse your behaviour. Thanks to this, we can see trends and patterns which help us improve many areas of our business activities.

You can see the full list of third parties that we use and therefore share your Personal Data with here. In all cases under this purpose, we remain the controllers of your Personal Data and these third parties can only use it to fulfil our purposes.

For this purpose, we process your Personal Data based on our legitimate interest in improving our services. At any time, you can object against this processing. We will then assess whether we can prove that our legitimate grounds for this processing override your individual interests, rights and freedoms. If not, we will cease to process your Personal Data for this purpose.

### Training and evaluation of our customer support staff

If you call us on our customer support line or contact us through email or chat, we will record the phone call or the messages for the purpose of improving our services. These recordings will be then sorted, and we will only keep those in which our staff made some sort of mistake

when dealing with your requests. These recordings are subsequently used during training sessions so that we can make sure these mistakes don't happen again.

For this purpose, we also process your Personal Data based on our legitimate interest in improving our services. At any time, you can object against this processing. We will then assess whether we can prove that our legitimate grounds for this processing override your individual interests, rights and freedoms. If not, we will cease to process your Personal Data for this purpose.

## Other purposes

### Establishment, exercise or defence of legal claims

We also store and process your Personal Data for the purpose of establishing, exercising or defending against legal claims. Whenever you book a ticket or order any other service, we will keep all relevant data for potential future legal claims that you or we could have.

Similarly, if you send us a data protection request, we will also be storing all the data you give us and the data about our handling of the request for this purpose

Generally, we will keep your data for this purpose for 4 years which is the maximum length of the statute of limitation (the maximum time in which you can file a lawsuit against us) set by the Act No. 89/2012 Coll, the Civil Code. We will never use your Personal Data for any other purpose when it is stored solely for this purpose.

For this purpose, we process your Personal Data based on our legitimate interest in the protection of our legal rights. At any time, you can object against this processing. We will then assess whether we can prove that our legitimate grounds for the processing override your individual interests, rights and freedoms. If not, we will cease to process your Personal Data for this purpose.

### Compliance with legal obligations

We need to process some of your Personal Data to be able to fulfil certain legal obligations that are applicable to us. Because this is a legal necessity, we don't need to obtain your consent for it. For this purpose, we will process your identification and contact information and information about your bookings. The main legal obligations we need to do this for arise from Act No. 89/2012 Coll, the Civil Code, Act No. 634/1992 Coll, on the protection of consumers, Act No. 235/2004 Coll, on Value Added Tax and Act. 563/1991 Coll, on Accounting. If you send us a data protection request to fulfil one of your rights under the GDPR, we will ask you for some personal data which we will then process for the purpose of achieving compliance with the GDPR.

# Who do we share your Personal Data with and why?

## Sharing data with other Data Controllers

We will share your Personal Data with third parties for their purposes. We send your data to the air carriers with which you, through our brokerage services, enter into a contract of carriage and whose identity will be made known to you before you enter into the agreement with us or with a provider of other services under the same conditions. In some cases, we also share your Personal Data with the operators of the Global Distribution Service.

This means that your Personal Data may be disclosed to selected carriers or other service providers in Third Countries. Each selected carrier will treat your Personal Data in accordance with their own Privacy Policy (which is published on every carrier's website). Disclosure of Personal Data to other service providers will be done in accordance with the applicable Personal Data laws and regulations.

## Sharing Data with Data Processors

There are many activities that we need completed but can't do by ourselves. Therefore, we use third-party partners to help us. In many such situations, the partners logically couldn't manage without your Personal Data. Because of this, we share it with them. However, in all cases like this, we remain controllers of your Personal Data and they act as processors.

That means that even though they are in possession of your data, they can only process it for our purposes and we are always in charge of it. They cannot under any circumstances use the data for their own purposes or to use the data in a way that would go against our agreement.

Furthermore, we only use partners that have given us sufficient guarantees that they comply with the GDPR requirements and that your data will be always kept safe.

## How long do we store your Personal Data?

In general, we will process your Personal Data until we won't need it for any of these purposes. The exception from this is the processing for the purpose of Sending personalized offers. Under this purpose, you will periodically get email offers from us, and in every email, there will be a clear and easy way to unsubscribe and therefore object to this type of processing. Therefore, we will keep and use your Personal Data for this purpose, until you unsubscribe.

## How to access and control your Personal Data?

We want you to always be in control of your Personal Data. To this end, you have certain rights that allow for it. Under certain conditions, you may:

- gain access to all your data that we use or processing, and even get a copy of all of it,
- ask us to delete your data,
- correct the data that we are processing if you think that there are mistakes,
- restrict the data processing,
- object to processing,
- receive your Personal Data in a commonly used and machine-readable format or to transmit this data to a different provider.

You can exercise your rights by sending us an email with your request through this email: [support@citizenplane.com](mailto:support@citizenplane.com).

Please note, that in order to ensure the safety of your Personal Data, we will only comply with the requests that are sent from the email address used during the booking or ordering of a service. If someone else did the booking for you, we will request that you provide additional information to us (Booking ID, etc) to ensure that you are really the owner of the Personal Data in concern.

## Cookies & Similar technology

Cookies are small text files placed on your device that allow us to remember certain information about you for multiple purposes, such as the operation of multiple basic functionalities of our website, storing your setting and preferences on our website, managing your account, preventing fraud, improving performance while browsing our website, marketing purposes or analysing your use of our website for the purposes of improving our website and our services.

Basically, on our site, you will encounter three types of cookies:

- Cookies that are strictly necessary for the operation of our website and provision of our services (these cannot be turned off),
- So-called "performance cookies", i.e. cookies that we use for statistics in order to improve our services, and
- Cookies that we use for marketing purposes.

## Transferring your data outside of the European Union

If we need to, we may transfer your Personal Data outside of the European Union. This will happen when you want to book a flight ticket with an air carrier from a Third Country or when you order a service from a provider based in a Third Country. Naturally, we need to transfer

your data to these third parties because without it, the provision of ordered services would not be possible.

For transfers to recipients in countries where we cannot rely on the decision of the adequate level of protection according to Art. 45 of the GDPR or appropriate safeguards according to the Art. 46 of the GDPR, we will transfer your Personal Data based on the exception in the Art. 49 Para. 1 Lett. b) of the GDPR. Each selected carrier or service provider will treat Your Personal Data in accordance with its own Privacy Policy (which is published on every carrier's website). Disclosure of Personal Data to other service providers will be done in accordance with the applicable Personal Data laws and regulations.

## Complaint with the supervisory authority

Data Protection is a serious matter and the rules are quite difficult to implement correctly. No one is perfect, and it may happen that we make a mistake. If you feel that we mishandled your Personal Data, please turn to us first and we promise that we will try our best to resolve the situation. You can always approach us with any privacy or data protection related issue through this email: [support@citizenplane.com](mailto:support@citizenplane.com).

Nevertheless, at any time, you have the right to lodge a complaint with a supervisory authority. If you are from the EU, you can complain at the authority in the member state of your residence, in the member state where you work or in the member state of the alleged infringement.