

General Data Protection Regulation - Privacy Policy

This is the Silver Flight B.V. Privacy Policy. Silver Flight B.V., Thermiekstraat 58 1117BD Schiphol The Netherlands. KvK nr.75035448, Telephone +31 619 60 98 94, e-mail: info@silverflight.nl is responsible for personal data in accordance with prevailing laws on data protection, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General data Protection Regulation, "GDPR"). Silver Flight B.V. collects, uses and discloses Customer Data for the purposes mentioned below in clause 2. This Privacy Policy outlines Silver Flight B.V. policy and responsibility in relation to the collection, use and disclosure of Customer Data.

By continuing to use Silver Flight B.V.'s services, you signify that you have read, understood and agree to be bound by this Privacy Policy as amended from time to time in respect of Silver Flight B.V.'s collection, use and disclosure of your Customer Data.

1. Types of Customer Data

The types of Customer Data that Silver Flight B.V. collects depends on the circumstances of collection and on the nature of the service requested or transaction undertaken. There are two broad categories of Customer Data that Silver Flight B.V. collects:

Personal Data:

- Personal information that links back to an individual e.g., name, gender, date of birth, passport and passport numbers, images, photographs, videos, surveillance video footage, voice recordings.
- Contact information e.g. address, phone number, email address.
- Payment information e.g. bank details, credit or debit card information, including the name of cardholder, card number, billing address and expiry date.
- Travel information e.g. flight information, dietary and seating or other service preferences.
- After your written consent health information e.g. disabilities, medical records or requests.
- Technical information e.g. IP address, browser type, etc.

Statistical Data e.g. number of passengers flown, hits to website. This is stored purely for analytical purposes, and is entirely anonymous. This information will not be stored to your customer record, and will only be aggregated for statistical analysis so that we can better understand Silver

Flight B.V. customer profile and improve Silver Flight B.V.'s service offering. For purposes of this policy statement, the phrase Customer Data includes Personal Data and Statistical Data.

In some cases, Silver Flight B.V. needs you to provide Customer Data in order for Silver Flight B.V. to be able to carry out its services to you. The failure to supply such Customer Data may result in Silver Flight B.V. being unable to provide you with the services and/or products requested;

2. Purposes for Collection, Use and Disclosure

Generally, Silver Flight B.V. collects Customer Data, either directly from you or from your authorized representatives (i.e. persons whom you have authorized, persons who have been validly identified as being you or your authorized representative pursuant to our then-current security procedures), from third parties (e.g. your travel agent or our service provider), or from publicly available sources, through our website, mobile services, and other channels including our ticketing counters, airport operations and personal interaction, in order to fulfil the following purposes,

- Providing services to you such as processing a transaction (e.g., making a booking), providing technical assistance, assisting you in the transaction, providing flight alert messages through Silver Flight B.V.'s mobile services facility, facilitating internet check-in and self check-in, and responding to your enquiries or requests.
- Providing airport services such as processing information relating to connecting flights, arrangements at airports, and customs and immigration facilities.
- Providing baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims.
- Providing in-flight catering and other services that best meet your preferences and needs (which we may collect during our interactions with you)
- Marketing and communicating with you in relation to products and services offered by Silver Flight B.V.'s and service partners, as well as Silver Flight B.V.'s appointed agents.
- Contacting you for product or customer satisfaction surveys.

Silver Flight B.V. may also use and disclose your Customer Data with and to third parties in order to fulfil the purposes listed above. In connection with the above, we may, collect, disclose, transfer, and jointly use your Customer Data to and with our subsidiaries and affiliated airlines. In addition, we may disclose your Customer Data to third parties, such as our travel service providers or travel-related businesses, partner airlines, airport management, security personnel, and other operators / carriers. Silver Flight B.V. may also use and disclose your Customer Data to persons who

have been validly identified as being you or your authorized representative(s) pursuant to our then current security procedures, for the purpose of the relevant transaction or enquiry. In particular, each of the passengers who are grouped under the same Passenger Name Record (PNR) number shall be deemed to be authorized representatives of each of the other passengers under the same PNR number, for the purposes of disclosure identified in this policy, regardless of the number of persons within each group. Silver Flight B.V. shall use its best endeavours to ensure that its employees, officers, agents, consultants, contractors and such other third parties mentioned above who are involved in the collection, use and disclosure of Customer Data will observe and adhere to the terms of this Privacy Policy. Silver Flight B.V. may disclose your Customer Data to law enforcement agencies and government for security, customs and immigration purposes. For example, Silver Flight B.V. and other airlines are required by laws in the United States of America, Great Britain and other countries to provide border control agencies with access to your booking information or flight itinerary. Accordingly, relevant Customer Data (known as Passenger Name Record (PNR) or Advance Passenger Information (API)) may be disclosed to the appropriate customs, immigration, and/or any other relevant authorities as required by law. Please be informed that the initial recipients of such information may share your PNR and API data with other government agencies or enforcement authorities. In addition, Silver Flight B.V. may disclose Customer Data to our legal advisors for establishing, exercising or defending our legal rights, to our other professional advisors, or as otherwise authorized or required by law. Silver Flight B.V. also reserves the right to share Customer Data as is necessary to prevent a threat to the life, health or security of an individual or corporate entities. Further, Silver Flight B.V. may disclose Customer Data, as is necessary, to investigate suspected unlawful activities including but not limited to fraud, intellectual property infringement or privacy.

3. Transfer of information overseas

Silver Flight B.V. Head Office is based in The Netherlands. Customer Data may be transmitted to data storage facilities where Silver Flight B.V. keeps its central records. Customer Data may be transferred to Silver Flight B.V.'s offices and appointed agents in connection with Silver Flight B.V.'s performance of the contract with you.

4. Consent

Generally, in the course of Silver Flight B.V. performing servicing functions such as making a flight booking, transmitting flight alert messages or accepting catering requests, Customer Data will, by nature of the task or transaction, be provided by our customers and passengers to Silver Flight B.V. In such instances, consent will necessarily be implied from the Customer that they are agreeable to providing Customer Data in order for Silver Flight B.V. to provide the requested or necessary service and/or product to them. However, where required by law, Silver Flight B.V. will

adopt an 'opt-in' policy for obtaining customer consent, in which event, express written consent will be sought from you when collecting your Customer Data e.g., signing a form or checking a box. Where you make reservations on behalf of another person, you undertake and will ensure that the individual whose Customer Data is supplied to Silver Flight B.V. has authorized the disclosure, is informed of and consents to the terms and conditions of this Privacy Policy.

You may submit a request to withdraw your consent at any time by contacting Silver Flight B.V. Statistical Data, is not linked to a customer record and Silver Flight B.V. does not need to seek consent for the collection, use or disclosure of Statistical Data.

5. Access

Silver Flight B.V. will, upon your written request to our Administration Department (see Section 10), process your request to view your stored Personal Data within four (4) weeks after your written request.

6. Retention

Silver Flight B.V. will retain Customer Data for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of Silver Flight B.V., or as required by relevant laws. When destroying Customer Data, we will take commercially reasonable and technically possible measures to make the personal information irrecoverable or irreproducible in accordance with the applicable laws.

7. Accuracy

Silver Flight B.V. needs your assistance to ensure that your Personal Data is current, complete and accurate. As such, please inform Silver Flight B.V. of changes to your Personal Data by contacting Silver Flight B.V. and submitting your updated particulars to Silver Flight B.V. Silver Flight B.V. may also request Personal Data updates from you from time to time. As detailed in Section 2 above under the "Purposes for Collection, Use and Disclosure" sub-section, your booking information or flight itinerary, may be disclosed to the appropriate customs and immigration authorities as required by law. As such, it is important to ensure that the Personal Data contained in your booking information or flight itinerary is current, complete and accurate.

8. Security safeguards

Silver Flight B.V. takes the security and protection of your Customer Data very seriously. As such, Silver Flight B.V. makes reasonable security arrangements to protect your Customer Data against loss or theft as well as unauthorized access and undue disclosure. As an example of a procedural safeguard, Silver Flight B.V. has implemented various authentication procedures internally and with our external service providers, that may involve Silver Flight B.V. requesting various personal

particulars from you in order to verify your identity (or that of your duly authorized agent), before Silver Flight B.V. processes your request for a particular service, product or transaction. Examples of technical safeguards include encryption, “firewalls” and Secure Socket Layer (SSL). Further details of these technical safeguards for Customer Data collected through Silver Flight B.V. website(s) and Silver Flight B.V.’s mobile services facility are set out at Part B below. If, however, a customer does not take reasonable care to ensure the continued confidentiality and accuracy of their Customer Data, Silver Flight B.V. will not be liable for any consequential misuse and/or fraud. If you have any concerns about security, you should contact Silver Flight B.V. (see Section 10).

9. Updates to the privacy policy

Silver Flight B.V. will amend this Privacy Policy from time to time without notice, and the updated versions will be posted on Silver Flight B.V.’s website and date stamped so that you are aware of when the Privacy Policy was last updated. Subject to applicable laws, the English version of this Privacy Policy will prevail over any version of this Privacy Policy in another language. In the event of any inconsistency in interpretation between the English version and any translation of the Privacy Policy, this Privacy Policy statement in English will prevail.

10. Your rights

According to the Data Protection Regulation, you have many rights concerning how we process your personal data. If you want to exercise your rights, as per below, please contact us.

10.1 Revocation of consent

If we process information about you based on your consent, you have the right to revoke your consent at any point in time by contacting Silver Flight B.V.. We will then terminate the processing of the personal data based on your consent according to Article 7.3 of the Personal Data Regulation.

10.2 Right to read the data

If you want to get more information about how we process your personal data or if you want to know what kind of personal data about you that we process, you can request to obtain your personal data according to Article 15 of the Personal Data Regulation. You have the right to request a copy of your personal data from our register.

10.3 Correction and deletion

If your personal data that Silver Flight B.V. processes are incorrect, incomplete or irrelevant, request that the data are corrected or deleted by emailing info@silverflight.nl, according to Article 16 - 17 of the Personal Data Regulation. Please note that deletion may mean that Silver Flight B.V. cannot perform booked services.

10.4 Right to restrict the processing

You may have certain rights to have your personal data processed restricted. If you have the right to have the treatment limited, in future we will only process the information - with the exception of retention - with your consent, or in order for legal claims to be established, claimed or defended, or to protect a person or important public interest, according to Article 18 of the Personal Data Regulation. This will probably mean that Silver Flight B.V. can no longer provide its services to you.

10.5 Right to object

You have the right to raise an objection at any point in time to the processing of your personal data that is based on our legitimate interest. If Silver Flight B.V. cannot demonstrate compelling legitimate grounds for the processing of your data that outweighs your interests, rights and freedoms or that the processing are done for the establishment, exercise or defense of legal claims, then Silver Flight B.V. will no longer process your personal data, Article 21 of the Personal Data Regulation.

10.6 Right to data portability

You have the right to request to receive your personal data that we process in a machine-readable format, as provided for in Article 20 of the Personal Data Regulation.

10.7 Right to complain

It is important for us that you feel safe and we will process your personal data with the utmost respect. If you still consider that Silver Flight B.V. is processing your personal data in an incorrect manner, you are welcome to contact us. You also have the possibility of submitting a grievance to The Dutch Data Protection Authority – <https://autoriteitpersoonsgegevens.nl>

11. Contact us

If you have comments, questions or complaints about or requests relating to this Privacy Policy statement, please contact Silver Flight B.V. in writing at the address below referencing 'Privacy Policy':

Silver Flight B.V., Thermiekstraat 58, 1117 BD, Schiphol; e-mail:
info@silverflight.nl; www.silverflight.nl
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