

Privacy Policy for the Lufthansa Group Airlines NDC Partner Program Website

We, the Lufthansa Group, take protection of your personal data seriously. We process personal data exclusively in accordance with applicable law, in particular the EU General Data Protection Regulation (Regulation (EU) 2016/679, “GDPR”). Below, we provide information on how we process your personal data when you use our services and products offered on this website, as well as your rights in this regard.

1 Who is the controller?

The controllers responsible for processing your personal data within the meaning of the GDPR are:

Air Dolomiti S.p.A Linee Aeree Regionali Europee (Dossobuono di Villafranca (VR), Via Paolo Bembo 70, Italy), Austrian Airlines AG (Office Park 2, Postbox 100, 1300 Vienna Airport, Austria), Brussels Airlines SA/NV (1050 Brussels, Belgium, Jaargetijdenlaan 100-102/B30 Av. des Saisons), Deutsche Lufthansa AG (Venloer Straße 151-153, 50672 Cologne, Germany), EW Discover GmbH (Hugo-Eckener-Ring 1, FAC Building, 60549 Frankfurt am Main, Germany), Italia Trasporto Aereo S.p.A. (Via Venti Settembre 97, Rome, 00187, Italy) and Swiss International Air Lines AG (Obstgartenstrasse 25, 8302 Kloten, Switzerland) – collectively referred to as “Lufthansa Group Airlines”.

Unless otherwise stated in this Privacy Policy, “we” or “us” refers to the above-mentioned Lufthansa Group Airlines as joint controllers for the processing of your personal data in accordance with Article 26 GDPR.

2 Who can I contact?

Data Protection Officer of Air Dolomiti S.p.A., Deutsche Lufthansa AG, EW Discover GmbH and Brussels Airlines SA/NV:

Deutsche Lufthansa AG

Corporate Data Protection Officer of the Lufthansa Group

FRA CJ/D

Lufthansa Aviation Center
Airportring
60546 Frankfurt/Main
Germany
(E-Mail: datenschutz@dlh.de)

Data Protection Officer of Austrian Airlines AG:
Austrian Airlines AG
Legal Office – Data Protection
Office Park 2
PO Box 100
1300 Vienna Airport
Austria
(Data subject rights request: [Data subject rights request | Austrian Airlines](#))

Data Protection Officer of Swiss International Air Lines AG:
Swiss International Air Lines AG
Data Protection Officer
ZRHS/CJ
PO Box
8058 Zurich Airport
Switzerland
(E-Mail: dataprotection@swiss.com)

Data Protection Officer of Italia Trasporto Aereo S.p.A.:
ITALIA TRASPORTO AEREO S.p.A.
Via Venti Settembre 97
00187 Rome
Italy
(E-Mail: dpo@ita-airways.com)

3 What personal data do we collect from you?

Personal data is any information about an identified or identifiable natural person that you provide to us or that is generated or collected by us. This includes:

Content data: When you use services on our website, such as contact forms, customer service, newsletters, or participation in competitions or surveys, the content data you enter (e.g. contact details) and that is generated about you, as well as the information we provide to you, will be processed.

Server log data: When you use our websites, data (such as the date and time of your visit, pages

accessed and files requested, the type and version of the web browser you are using, the type and operating system of the device you are using, and your IP address) is temporarily stored in a log file on our servers.

4 For what purposes and for how long do we process personal data?

4.1 Your inquiries

If you send us inquiries via a contact form, email, chat, we will process your content data to respond to your inquiry and, if necessary, your IP address and the date/time of the inquiry to prevent misuse of the contact form.

The legal basis for processing is Art. 6 (1) (f) GDPR. Our and your (legitimate) interest in this data processing arises from the goal of responding to your inquiries, resolving any problems that may arise, and thus maintaining and promoting your satisfaction as a customer or user of our website. If your request is aimed at initiating or executing (including customer service or warranty) a contract, the additional legal basis for processing is Art. 6 (1) lit. b GDPR.

If the processing is based on the legal basis of legitimate interests, you may object to the processing of your data on the basis of Art. 6 (1) lit. f GDPR. We may then continue processing if we can demonstrate compelling reasons for doing so. In this case, this may be necessary in particular to be able to document past communications and inquiries with you. If there are no such compelling reasons, we will cease communication with you and delete any data already collected.

This data will be deleted once our communication with you has ended, i.e. once the matter in question has been conclusively clarified and there are no further legitimate interests in storing the data or no further legal obligations to store it.

4.2 Cookies and analytics (eTracker)

Details on the processing of cookies and similar technologies can be found in the “Cookie Privacy Policy” [[Cookie Policy | Lufthansa](#)].

We use eTracker GmbH, Hamburg, Germany for usage analytics only if you consent via the cookie banner.

Purpose: statistical analysis to improve our website.

Legal basis: Art. 6(1)(a) GDPR (your consent). You can withdraw or change your choices at any time via the fingerprint icon on the website.

Storage location: according to the provider, processing/storage occurs in Germany; IP addresses

are anonymised as early as possible, and identifiers are converted to a non-attributable key. No combination with other data or disclosure by eTracker.

YouTube: Our cookie banner lists YouTube as a vendor option. Currently, our pages do not embed YouTube videos; we only link externally. Therefore, no YouTube cookies are set by this website unless and until embedded content is introduced.

4.3 Enforcement of legal claims

For the purpose of enforcing our own legal claims and defending our legal position, we process the personal data necessary for enforcement or defense in individual cases.

The legal basis for processing is our legitimate interest in enforcing legal claims and defending our own legal position (Art. 6 (1) (f) GDPR). In justified cases, you can object to this data processing at any time, e.g. by sending an email to the above-mentioned contact options.

The data required for this purpose will be deleted after the legal dispute has been concluded and after the statutory retention period has expired.

4.4 Ensuring the technical infrastructure and provision of the website

The processing of server log data serves the technical provision of the website and subsequently the assurance of system security and protection of the technical infrastructure in order to detect malicious access to our website.

The legal basis for processing is our legitimate interest in providing the website/app with our services and protecting our technical infrastructure (Art. 6 (1) (f) GDPR). Processing is essential for the use of our website. In justified cases, you can object to this data processing at any time, e.g. by sending an email to the above-mentioned contact options.

This data will be deleted after 180 days at the latest.

5 Who do we share your data with?

Within the scope of the above-mentioned data processing and the respective legal bases, your data may be passed on to the following categories of recipients:

5.1 Transfer of data to processors

In some cases, we use service providers in compliance with legal requirements by way of data processing, i.e., on the basis of a contract on our behalf, according to our instructions, and under our control.

Processors are, in particular,

- service providers, e.g., for the provision of the website, the sending of newsletters, the processing of feedback,
- cloud service and hosting providers (for data storage and infrastructure),
- service providers for the operation and maintenance of our IT systems,
- technical service providers that we use to provide our website and the functionalities offered there, e.g., technically necessary cookies,
- service providers for the practical implementation of advertising and marketing, e.g., service providers for email delivery and analysis cookies.

In these cases, we remain responsible for data processing; the transfer and processing of personal data to or by our processors is based on the legal basis that allows us to process the data in each case. A separate legal basis is not required.

5.2 Transfer of data to Lufthansa Group Airlines (Joint Controllorship under Art. 26 GDPR)

For the jointly defined processing purposes described below, we transfer specific personal data to the Lufthansa Group Airlines where such disclosure is necessary.

For these processing activities, the participating airlines act as joint controllers within the meaning of Art. 26 GDPR. The airlines have concluded an agreement determining their respective responsibilities for the processing of your data and for the fulfilment of data protection obligations.

Your data may be shared between the participating airlines for the purpose of analyzing and improving services, enhancing customer experience and optimizing Lufthansa Group offers. Legal basis: Art. 6(1)(f) GDPR (legitimate interests of the participating airlines in improving and aligning their service offering).

Under the joint controllership arrangement:

- Deutsche Lufthansa AG is primarily responsible for providing you with information pursuant to Art. 13 and 14 GDPR and for coordinating the fulfilment of your data subject rights.
- Each participating airline is responsible for ensuring compliance with the GDPR for the processing operations carried out within its sphere (e.g., ensuring security measures, handling its own internal processing steps).

You can assert your rights under sections 7 and 8 of this privacy policy against any participating airline.

5.3 Transfer of data to third parties

In addition, we also transfer your data to third parties. Such partners provide their services as independent controllers.

These partners are in particular:

- Independent controllers in the NDC/SPRK value chain, where needed to validate and enable your requested setup: GDS, Aggregators, direct API consumers and the NDC API Provider.

5.4 Transfer of data to third countries

In some cases, we transfer personal data to recipients who are not located within the immediate scope of the GDPR (“third countries”). If the EU Commission has not decided that these countries offer an adequate level of legal protection for your personal data, we must either ensure that we implement sufficient safeguards for your personal data or that one of the legal exceptions applies.

As safeguards pursuant to Art. 46 (2) lit. c GDPR, we regularly use EU standard contractual clauses adopted by the EU Commission with recipients in third countries that are not recognized as safe. Nevertheless, in some countries there is a risk that your data may be requested by national authorities for control and surveillance purposes without the conditions being clearly regulated or without the possibility of legal recourse. Where such risks exist that are considered unreasonable by the case law of the European courts (for example, as in some constellations in the case of the USA), we will take additional protective measures and agreements as far as possible. Further information about these third-country transfers and, in particular, a copy of the standard contractual clauses can be obtained from the contact options listed in section 2.

6 What kind of automated decision-making is used?

Automated decision-making (including profiling) is a process in which no substantive assessment and decision based on this assessment has been made by a natural person.

We do not use automated decision-making that has a legal effect on you or similarly significantly affects you. Should we use such a process in the future, we will inform you of this in accordance with our legal obligations.

7 What rights do you have?

You have the following rights with regard to our processing of your personal data:

Right of access (Art. 15 GDPR): You have the right to obtain confirmation from us as to whether or not we are processing your personal data. If we process personal data, you have the right to obtain information about this data and about the purposes of processing, data categories, data recipients, storage period, data origin, information about your rights, and the existence of automated decision-making, including profiling.

Right to rectification (Art. 16 GDPR): If your personal data is inaccurate or incomplete, you have the right to request that we rectify it.

Right to erasure (Art. 17 GDPR): You have the right to request the erasure of your personal data. This is also known as the right to be forgotten. There is no blanket right to erasure of all personal data. We may be legally obliged to continue processing some of your personal data, or processing may be necessary for the performance of the employment relationship.

Right to restriction of processing (Art. 18 GDPR): You have the right to request the restriction of the processing of your personal data. If processing is restricted, the data will be blocked.

Right to data portability (Art. 20 GDPR): If the processing is based on your consent or if the personal data must be processed automatically for the performance of a contract, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used, and machine-readable format or to transmit this data to another controller.

Right of withdrawal (Art. 7 (3) GDPR): If you have consented to processing by means of a corresponding declaration, you can withdraw your consent at any time for the future. This does not affect the lawfulness of data processing carried out based on consent until withdrawal.

Right to object (Art. 21 GDPR): If we process your data to protect legitimate interests, you can object to this processing at any time at [contact details, e.g., email], provided that there are reasons arising from your particular situation that prevent us from processing your data. You have the right to object to the processing of your personal data for direct marketing purposes at any time without giving reasons. Data processing will then be terminated unless Deutsche Lufthansa AG can demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject, or if the processing serves to assert, exercise, or defend legal claims.

To exercise your rights, please contact the company data protection officer using the contact details provided in section 2.

8 Right to lodge a complaint with a supervisory authority

In addition, you have the right to lodge a complaint with a data protection supervisory authority.

The competent supervisory authority for Deutsche Lufthansa AG is:
Der Hessische Beauftragte für Datenschutz und Informationsfreiheit
Postfach 3163
65021 Wiesbaden
Germany

The competent supervisory authority for Air Dolomiti S.p.A Linee Aeree Regionali Europee is:
Garante per la protezione dei dati personali
Piazza Venezia 11
00187 Rome
Italy

The competent supervisory authority for Austrian Airlines AG is:
Austrian Data Protection Authority
Barichgasse 40-42
1030 Vienna
Austria

The competent supervisory authority for Brussels Airlines SA/NV is:
Autorité de protection des données
Gegevensbeschermingsautoriteit
Rue de la presse 35
1000 Brussels
Belgium

The competent supervisory authority for EW Discover GmbH is:
Der Hessische Beauftragte für Datenschutz und Informationsfreiheit
Postfach 3163
65021 Wiesbaden
Germany

The competent supervisory authority for Italia Trasporto Aereo S.p.A. is:
Garante per la protezione dei dati personali
Piazza Venezia 11
00187 Rome
Italy

The competent supervisory authority for Swiss International Air Lines AG is:
Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter
Datenschutzberater

Feldeggweg 1
3003 Bern
Switzerland

This privacy policy may be amended to reflect changes in our data processing practices or legal requirements. The current version (17.02.2026) is available on our website at any time.