

DATA PROTECTION DECLARATION

1. Data controller

In the following, we, Deutsche Lufthansa AG (Venloer Strasse 151-153, 50672 Cologne, Germany), inform you about the processing of your personal data in the course of your use of our website www.lhgroupairlines.com/ndc (Lufthansa Group Airlines NDC Partner Program).

In the following, Lufthansa Group Airlines refers to the airlines Lufthansa, SWISS International Airlines AG, Austrian Airlines AG, and Brussels Airlines N.V. The Lufthansa Group includes Lufthansa Group Airlines as well as the other companies of the Lufthansa corporation.

Our website may contain links to the websites of other providers that do not observe this data protection policy.

If you have any further questions regarding data protection in connection with our website or the services offered on it, then please contact our data protection officer:

Lufthansa Group Data Protection Officer
Dr Barbara Kirchberg-Lennartz
Deutsche Lufthansa AG
E-mail: datenschutz@dlh.de

Please address any request for information to:
Deutsche Lufthansa AG
Data Information
FRA CY
D-60546 Frankfurt/Main

Or by e-mail to:
dataaccess@dlh.de

If you contact us by e-mail, communication is unencrypted.

2. Scope, purpose and legal basis for the processing of personal data

In the following situations, we will collect and use personal data directly from our users or from other sources (as explained below):

2.1. Hosting of the website and creation of log files

When users visit our website, our system automatically records data and information from the computer system of the visiting computer upon each visit. The following data is collected (“technical information”):

- (1) Information about the browser type and version used
- (2) Operating system of the user
- (3) Date and time of access
- (4) Websites from which the user’s system accessed our website
- (5) Websites that are accessed by the user’s system from our website

The data is also saved in the log files of our system. This does not include the IP addresses of the user or other data that would allow association of the data to a user. This data is not saved along with the user’s other personal data.

We collect and use this technical information for the purposes of (network) security (for example, in order to be able to combat cyber attacks) and marketing, and in order to be able to understand the needs of our users better, also to make continuous improvements to our website and enable users to access the website on their computers.

The legal basis for the temporary storage of data is Art. 6 (1) f) of the General Data Protection Regulation (GDPR).

Personal data is processed by us in order for us to fulfil our contractual obligations under Art. 6 (1) subpara. 1 b) GDPR. In particular this includes:

- issuing an access and content agreement for the NDC API of the LHG

We also process your data to safeguard our legitimate interests under Art. 6 (1) subpara. 1 f) GDPR

- in order to provide you with relevant information about your LHG NDC API
- for auditing purposes
- to guarantee IT security and the IT operations of the airline
- for the purposes of producing statistics on international air traffic

We process your data based on your consent under Art. 6 (1) subpara.1 a) GDPR for specific purposes, in particular:

- to distribute the newsletter for our Lufthansa Group NDC partner programme
- to send you special information and offers from Lufthansa and its partner companies
- for market research and customer surveys
- for analytical purposes in order to optimise our offer for you.

Any consent given can be withdrawn at any time. To exercise your right, please email datenauskunft@dlh.de. This also applies to the withdrawal of declarations of consent given to us even before the GDPR came into effect, i.e. before 25/05/2018. The withdrawal of consent is only effective for the future and does not affect the lawfulness of data processing up to the time of withdrawal. In some cases, we may be entitled in spite of your withdrawal to continue to process your personal data on a different legal basis – to perform a contract, for example.

Information about your right to object pursuant to Art. 21 GDPR

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions.

The controller shall no longer process the personal data concerning you unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or processing is necessary for the establishment, exercise or defence of legal claims.

Where personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where you object to processing for direct marketing purposes, the personal data concerning you shall no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

2.1.1. Use of cookies

Our website uses cookies. Cookies are text files that are saved onto the user's computer system in and by the internet browser. When a user accesses a website, a cookie may be saved on the user's operating system. This cookie contains a characteristic string of characters that allows a unique identification of the browser upon subsequent access of the website.

Cookies are saved on the user's computer and are transmitted to us by the computer. Therefore, you as the user have full control over the use of cookies. By changing the settings in your internet browser, you can deactivate or limit the transmission of cookies. Cookies that have already been saved can be deleted at any time. This can also be implemented automatically. If cookies are deactivated for our website, it is likely that not all functions of the website will be fully available to you.

You can find more information about the cookies we use, their purpose, and the legal basis/bases for them in our Cookie Policy [<https://lhgrouppairlines.com/cookie-policy/>].

2.1.2. Tracking tools

On our website, we use the following tracking and (re)marketing tools:

- **E-Tracker**

The legal basis for the use of the tools listed is our legitimate interest in accordance with Art. 6 para. 1 (f) of the GDPR for the purposes of increasing the efficiency of our website and (direct) marketing.

You can find more information about the specific tools in the annex and the "Tracking Tool Policy".

2.2. Obligation to disclose personal data

For legally stipulated or contractual requirements, we have marked on our website forms the input fields that you are required to fill in so that we can provide you with the desired contract or service. Beyond this, personal data is only processed if you provide us with it, of your own accord, in order to implement the Lufthansa Group Airlines NDC Partner Programme.

3. Forwarding of personal data to third parties

In order to be able to offer you our products and services, we may be required to forward your personal data to third parties within or outside the Lufthansa Group, based on our contractual obligations or in accordance with our legitimate interests. These recipients can be categorised as follows:

- Service providers
- Marketing
- IT
- Customer Service Desk
- Governmental agencies and authorities

In the process, personal data may be transmitted to third countries or international organisations. For your protection and the protection of your personal data, adequate safeguards are provided in the event of such data transmissions under and in accordance with the legal preconditions (in particular, EU standard contractual clauses are used) or if there is an Adequacy Resolution issued by the EU Commission (Art. 45 of the GDPR).

You can find information about the EU standard contractual clauses at [<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:039:0005:0018:EN:PDF>]. Regarding its Adequacy Resolutions, the EU Commission provides the necessary information here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu].

You may also request a copy of the security precautions used from [datenschutz@dlh.de].

In addition, we are legally obliged to hand over personal data to German and international authorities, Art. 6 (1) c) GDPR in conjunction with local and international regulations and agreements.

4. Rights of data subjects

It is very important to us at Deutsche Lufthansa AG that our processing methods are fair and transparent. Therefore, in addition to the right of appeal, we aim to ensure that data subjects can exercise the following rights, under the necessary legal preconditions:

- Right to information, Art. 15 of the GDPR
- Right to rectification, Art. 16 of the GDPR
- Right to erasure ("Right to be forgotten"), Art. 17 of the GDPR
- Right to restrict processing, Art. 18 of the GDPR
- Right to data portability, Art. 20 of the GDPR

To exercise your right, please email datenauskunft@dlh.de.

Please provide the following details so that we can identify you:

- Name
- Postal address
- Email address

In order to be able to process your request, as well as for identification purposes, please note that we will use your personal data in accordance with Art. 6 (1) c) GDPR.

You also have the right to file a complaint with a supervisory authority. The competent supervisory authority for Deutsche Lufthansa AG is:

Regional Officer for Data Protection and Information Freedom of the State of North Rhine-Westphalia
Postfach 20 04 44
40102 Dusseldorf

Kavalleriestr. 2-4
40213 Dusseldorf

Phone: 0211/38424-0
Fax: 0211/38424-10
E-mail: poststelle@ldi.nrw.de

5. Disclaimer and limits of these data protection guidelines

These data protection guidelines pertain only to the processing that takes place on the website <https://lhgrouppairlines.com/ndc/>; our website may contain links to websites of other providers. Other websites are not subject to these data protection guidelines and may provide their own specific data protection guidelines.

Annex – Notes on tracking and remarketing tools used

Lufthansa uses remarketing services to advertise to you on third-party websites after you have visited our service. We, and our third-party vendors, use cookies to inform, optimise, and serve ads based on your past visits to our service.

eTracker

The provider of this website uses the services of eTracker GmbH in Hamburg, Germany (<https://www.etracker.com>) for the analysis of usage data. Cookies are used in order to enable a statistical analysis of the usage of this website by its visitors, as well as to display contents or advertisements based on usage. Cookies are small text files that are saved onto the end device of the user by the internet browser. eTracker cookies do not contain any information that would allow the identification of a user.

The data produced with eTracker is processed and saved by eTracker exclusively in Germany on behalf of the provider of this website and is subject to the strict German and European data protection laws and standards. eTracker was independently reviewed, certified, and awarded the data protection quality seal (<https://www.eprivacy.eu/kunden/vergebene-siegel/firma/etracker-gmbh/>) for this.

Data processing is carried out on the legal basis of Art. 6 (1) f) (legitimate interest) of the EU General Data Protection Regulation (EU GDPR). Our legitimate interest lies in the optimisation of our online services and internet presence. Because the privacy of our visitors is of the utmost importance to us, the IP address is anonymised as soon as possible in eTracker, and login or device recognitions in eTracker are converted into a unique key that is not assigned to an individual. There is no other use, compilation with other data, or forwarding to third parties by eTracker.

Click for further information about data protection and eTracker (<https://www.etracker.com/en/data-privacy/>).