

# **PRIVACY STATEMENT OF FLUGLADEN.AT**

This is the privacy statement of Flugladen.at. We are a customer focused company that values your privacy and is dedicated to protecting your personal data. In this privacy statement we aim to provide transparent and clear information on how we collect, use and process your personal data. We also outline your rights and provide guidance on how to exercise them, ensuring you remain informed and in control over your personal data.

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## **1. When is this privacy statement applicable?**

This privacy statement is applicable to any and all personal data that we collect, use, share and store about you when you book an airline ticket with us, when you visit our website or when you are in contact with us.

Our website contains links to websites of third parties. This privacy statement is not applicable to the collection of data via the said websites and we are neither responsible for it. See the privacy policy of the relevant website (where available) for more information.

This privacy statement was most recently amended in July 2024 and replaces earlier versions. We may amend this privacy statement from time to time to make sure it is up to date with new developments. Therefore, we recommend that you occasionally check the statement. You can always see when the last change took place.

## **2. Who is responsible for your data?**

For many years Flugladen.at has been looking for the cheapest airline tickets for you. We compare airline tickets of more than 800 airlines for more than 9,000 destinations worldwide. Find your tickets in an easy way, compare the prices and book your flight. Hotel or hired car with your airline ticket? For more information go to [our website](#).

Flugladen.at is a brand name of Travix. Travix is the largest Dutch online travel agency with five independent websites: Cheaptickets, Vliegwinkel, BudgetAir, Flugladen and Vayama. For more information go to the [website of Travix](#).

Travix Nederland B.V., established at Hoekenrode 3 in Amsterdam, is responsible for the collection and use of your personal data as described further in this privacy statement. The responsible Data Protection Officer (DPO) is Marein Roelandschap, and can be reached by email on [dpo@travix.com](mailto:dpo@travix.com). If you have questions, comments or complaints about the use of your personal data by Travix then contact our [customer service](#).

### 3. What data do we collect and how?

We collect five categories of personal data about you: (1) name and contact details, (2) booking details, (3) data that we collect when you contact our customer service, (4) data that we collect when you visit our website or read our newsletter, and (5) social media details.

#### 1. Name and contact details

These are the data that you enter when you book an airline ticket, e.g. your given names and surname, date of birth, address and place of residence and your telephone number and email address.

When you create a My Trip account then we register your login details and other information that you enter or change in your account. If you travel for business purposes, then you can enter your company name when you book. If you travel with somebody else, then we also collect a part of the data outlined in this section about your fellow travelers.

#### 2. Booking details

Booking details are the data about the airline ticket that you purchased from us. For instance, flight information (flight date, destination, price, etc.), data about the hotel you booked (number of nights, type of room, price, etc.) or the car that you hired (type of car, price, etc.). We also record what potential additional services you purchased, e.g. an airline ticket guarantee, travel insurance, service package, additional luggage or a parking space at Schiphol.

To book an airline ticket we need your passport number for certain destinations. You can also enter customer numbers of third parties (e.g. your frequent flyer number) if you want to qualify for the relevant privileges or other benefits. With your consent, we save these numbers and your travel preferences (e.g. whether you travel for personal or business purposes and what your favorite airport is) in your My Trip account.

When you order an airline ticket, you are forwarded to the payment environment to complete your order. To complete this payment, you must enter your payment details, e.g. a bank account or credit card number.

Via our website, you can indicate if you want to bring along special luggage on your flight, e.g. medical luggage or a wheelchair. In pursuance of privacy legislation, these data are qualified as sensitive as they refer to your health. By entering these kinds of data, you agree that we collect, use and share these data with third parties for the objectives described in [section 4](#).

#### 3. Data that we collect when you contact our customer service

When you contact our customer service by email, WhatsApp, social media, chat, contact form or telephone, then we establish these contact moments in our systems. We may record telephone

conversations in view of training purposes or to prevent or fight fraud.

#### 4. Data that we collect when you use our website or read our newsletter

When you visit our website, we register, inter alia, your IP address, type of browser and web browsing behavior. We register, for instance, if you are looking for European destinations or actually beyond. We also collect this information via cookies, scripts, pixel tags and similar technologies. See our [cookie statement](#) for more information. If you receive a newsletter from us, then we register when you open this newsletter or when you click on a link.

#### 5. Social media details

Depending on the settings of your social network, we may receive information from the provider of the said service. If you, for instance, create a My Trip account via your Facebook or Google account then we may receive a part of your public social media profile, including your user name, profile photo, "likes" and friends. Also, if you communicate with us via our social media pages (e.g. when you place a comment, upload a photo or click the "like" button) we may receive these data. See the privacy policy of your social media provider for more information about the personal data that we receive and how you can change your settings.

We collect the aforementioned data in three ways: (1) we record the data that you enter when you book an airline ticket, create a My Trip account or contact our customer service, (2) we automatically record data when you surf on our website, open a newsletter or communicate with us via social media, and (3) we receive data about you from Travix group companies, social media networks and our partners, e.g. Booking.com.

### **4. How do we use your data?**

Flugladen.at uses your data for four objectives: (1) for the supply of our services and for maintaining contact with you, (2) for research to improve our services, (3) for direct marketing based on your preferences and behavior, and (4) for our administration and for compliance with legislation and regulations.

#### 1. For the supply of our services and for maintaining contact with you

When you book an airline ticket, hotel or car, we use the data as described in [section 3](#) for this. We use your name, passport number and other personal data to, for instance, issue the e-ticket and to book your hotel or car. We forward your frequent flyer number to your airline in order that they can book saved points on your account.

We only supply your medical data (e.g. a requested wheelchair or details about your medical luggage) to the airline in order that they can provide you with the requested care. We do not use these data for other objectives.

We use your contact details to communicate with you. Think about, for instance, sending your e-ticket or warning you by email that you can check-in with your airline. We also use your contact details to answer your questions when you contact our customer service.

We use your payment details to handle your payment. Our fraud department checks, in association with our payment provider, if there is a question of a fraudulent booking that uses, for instance, a stolen or blocked credit card.

## 2. For research to improve our services

We research trends with regard to the manner that visitors and customers use our services, website, customer services and social media. We do this to gain insight into the behavior and the preferences of our visitors and customers in order that we can thus improve our services, the content on our website and our customer service. We also use the said insight to develop new services.

For this research, we use automatic tools with which we analyze the data outlined in [section 3](#), including your booking details, additional services you purchased and information about you (such as gender and your residence). Names, email addresses or other information that can be traced back to specific persons are not analyzed, as we are only interested in general trends. We neither use sensitive data. We may also combine the analyzed data with data that we collect with cookies and similar technologies when you visit our website or information that we receive from group companies or from other sources.

## 3. For direct marketing based on your preferences and behavior

We use your data to send you newsletters, offers or other promotional messages. We do this via email and other digital channels, e.g. apps and social media.

To adapt these messages to your preferences and behavior, we analyze and combine your data. We use automatic tools for this that analyze your data saved in our data management platform. For this purpose, we use your booking details, information about additional services you purchased and information about you (such as gender, residence and your flight preferences). We do not only analyze and combine the data that you entered but also data that we collect via cookies, scripts, pixel tags and similar technologies (see our [cookie statement](#) for more information), social media and when you contact our customer service.

In our emails, we include personalized offers from Travix and our partners relating to our services and products. For example, we include offers of our own additional services (extra luggage or an insurance) or for services or products from our partner companies in the travel sector (flight tickets, rental cars, hotels, airport parking, insurance products, visa services as well as similar products and services).

We use Custom Audiences of Meta (Facebook, Instagram), TikTok, DoubleClick and other networks to show you advertisements of CheapTickets.nl when the said network or an affiliated website is visited. In case you accepted our marketing cookies when you logged on to our website, we may send your email address or other identifying data to social networks such as Meta and TikTok in order that it can check if you have an account. To determine our audience, we use your booking details. See the website of your social network for more information about Custom Audiences. By accepting our marketing cookies, you have provided consent for receiving personalized ads on your Meta and TikTok timeline or other social media via our cookie policy. If you do not want your email address to be used for Custom Audiences, see our [cookie policy](#) on how you can withdraw your consent

Where we receive your email address in the context of a sale of a service or product, you may regularly receive emails from us with useful travel information, abandoned cart information, information on offers for our services or products which are similar to the services or products that you have already purchased as well as invitations to customer satisfaction surveys and customer reviews, unless you have objected to such use. The legal basis for doing so is our legitimate interest (see a list of our legitimate interests below) in approaching our customers for direct marketing purposes, Article 6(1)(f) GDPR. You may object to the use of your email address for this purpose at any time by sending an email to [privacy@travix.com](mailto:privacy@travix.com), contacting [our customer service](#) or by clicking on the 'unsubscribe' link at the bottom of each communication, without incurring any costs other than the transmission costs according to the basic rates.

Furthermore, where you subscribe to our newsletter, you will regularly receive emails from us with offers for our services or products as well as offers for services or products from our partner companies in the travel sector (flight tickets, rental cars, hotels, airport parking, insurance products, visa services as well as similar

products and services). In addition, our newsletter gives you the opportunity to take part in sweep stakes / lucky draws, receive abandoned cart information and submit customer reviews and ratings. The legal basis for sending you our newsletters is your consent, Article 6(1)(a) GDPR. You may revoke your consent at any time with effect for the future by clicking on the respective 'unsubscribe' link at the bottom of each newsletter, by sending an email to [privacy@travix.com](mailto:privacy@travix.com), by adjusting your newsletter preferences in your My Trip account or by contacting [our customer service](#).

When you unsubscribe, you will still receive our service emails (such as your booking confirmation and e ticket). You may object to the use of your personal data for direct marketing purposes anytime (please see section 7).

#### 4. For our administration and for compliance with legislation and regulations

We use your personal data for internal administration purposes, such as record keeping and to comply with our legal and fiscal obligations.

We collect and use your personal data to provide our services to you, to comply with our statutory obligations, for our legitimate interests or the interests of a third party or with your consent, for example in situations where we collect and use your medical data.

#### Our legitimate Interests:

Along with the detailed purposes for which we process your personal data, as listed above, our legitimate interests include the following:

- Security and safety purposes, as well as fraud prevention;
  - Providing more personalized services and offerings to you to ensure that your experience with Flugladen.at is as useful and relevant as possible thereby improving your customer experience;
- Contacting you to invite you to participate in real market research.

If you revoke your consent or if you do not supply the data that we need for the performance of the contract with you or to comply with our statutory obligations, then you may not be able to use our services or only to a limited extent.

If we process your personal data for our legitimate interests or the interests of a third party, we have balanced these interests against your privacy interests ensuring that our legitimate interests do not have unfair consequences for your own rights and freedoms. We will take measures to safeguard your privacy interests and to prevent unwarranted harm to you, as appropriate. More information on these balancing tests is available upon request.

Where we process your personal data for our legitimate interests or the interests of a third party, you have the right to object at any time on grounds relating to your particular situation (see section 7).

### **5. What third parties have access to your data?**

We exchange your data with or make your data available to third parties within the framework of the following three objectives: (1) with partners to implement your bookings, (2) with our group companies and brands for support services, statistical research and direct marketing, and (3) with our suppliers who provide supporting services. Only if Travix is by law held to do so shall we supply your data to supervisory authorities, tax authorities and investigate authorities.

#### 1. Implement bookings

We supply your data to partners who are directly involved in your booking. We supply your data to, for

instance, airlines and other service providers who are involved in the implementation of your flight. When you opt for a travel or cancellation insurance, we supply your data to the insurer. When you reserve a parking space, book a hotel or hire a car, we supply your data to the relevant providers.

## 2. Group support services, research and direct marketing

For the supply of our services, we rely on support services provided by Travix group companies. We have, for instance, call centers in India and Egypt so we can provide you customer service around the clock. These group companies have access to your data as required for their business function. Your data are available to Travix Nederland B.V. and are used within the framework of Flugladen.at and other Travix brands, e.g. Vliegwinkel and BudgetAir. Your data are used within these brands for research and direct marketing (see section 4). When you, for instance, book an airline ticket with Flugladen.at then we make sure that you do not receive direct marketing from Vliegwinkel.

Travix is part of the Trip.com Group. Trip.com Group companies also provide supporting services to Travix. Trip.com Group is a leading global provider of travel services that includes brands such as Trip.com, Skyscanner and Ctrip. Across its platforms, Trip.com Group helps travelers around the world make informed and cost-effective bookings for travel products and services.

Companies within the Trip.com Group assist Travix with purposes described in this privacy statement, including providing services to you. For example, they facilitate the booking flow, process payments, chargebacks, provide customer services, fraud prevention and IT security solutions.

## 3. Reliance on supporting services

For the supply of our services we rely on third parties, e.g. IT suppliers, marketing agencies, online advertising companies, credit card companies, payment providers, service providers in the area of fraud prevention and online bookings. We conclude agreements with these third parties in which it is, inter alia, determined that they shall handle your data confidentially and shall secure these data adequately.

Our group companies, Trip.com Group companies, partners and service providers are established in the European Union but also beyond. If this kind of party has access to your data, then this constitutes an international transfer of personal data. For example, an Asian airline that receives your data from us within the framework of a booked flight. Travix supplies data to, inter alia, group companies, Trip.com Group companies, partners and service providers in India, China, Singapore, the United States and Russia. The regulations in these countries do not always provide the same level of protection of personal data as the regulations in the Netherlands. Where required, CheapTickets.nl takes appropriate measures to comply with the requirements that the applicable privacy regulations impose on the international transfer of personal data.

We conclude, for instance, so-called European Model Agreements for the transfer of personal data with our group companies, Trip.com Group companies, and service providers (see article 46 GDPR). We will also supply personal data to recipients established in the US if they have a valid EU-US Data Privacy Framework certification (article 45 GDPR). In some cases, we will ask your explicit consent to transfer personal data outside the European Union (article 49 GDPR). If you want to receive a copy of these (contractual) guarantees then please contact our [customer service](#).

## **6. How do we secure your data and how long do we retain them?**

Flugladen.at takes technical and organizational security measures to protect your data against loss or unlawful use, e.g. unauthorized insight into data. In this respect, we take the state of the art and the cost of the implementation into account in order that we guarantee an appropriate level of security regarding

the risks that the processing and the nature of the data to be protected bring about.

We retain your data as long as required to realize the objectives as described in this privacy statement but generally no longer than 2 years after your last interaction with us, unless in so far as such is necessary for compliance with our statutory obligations or for the benefit of potential disputes. If we no longer require data then we destroy these data or anonymize them in order that they can no longer be linked to you.

## **7. How can I exercise my statutory rights?**

You may contact our customer service to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to data portability and (6) the right to object to processing. Please note that you may be required to provide additional information to verify your identity. [Learn more](#)

### **1. Right to access**

You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

### **2. Right to rectification**

You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement. Via your My Trip account you can also obtain insight into your data and you can always consult or correct these data.

### **3. Right to erasure**

You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law and listed under article 17 of the GDPR. This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

### **4. Right to restriction of processing**

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continue storing your personal data. We will inform you before the restriction is lifted.

### **5. Right to data portability**

Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible we will transmit your personal data directly to the other controller.

### **6. Right to object**

You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. This only applies in case the 'legitimate interests' ground (including

profiling) constitutes the legal basis for processing (see paragraph 4).

At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. You can always exercise this right by revoking your previously given consent by following the instructions in the relevant marketing communication. In case you exercise this right, we will no longer process your personal data for such purposes.

There may be situations where we are entitled to deny or restrict your rights described in this paragraph. In any case, we will carefully assess whether such an exemption applies and inform you accordingly.

We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply in case the personal data was not provided by you or if we process the data not on the basis of your consent or for the performance of a contract.

You can also contact us if you have any questions, remarks or complaints in relation to this privacy statement. If you have any unresolved concerns, you also have the right to lodge a complaint with your Data Protection Authority.