

## PRIVACY NOTICE

Name of Processing Activity	<b>SALES AND MARKETING</b>
Identity and Contact Details	Jetflite Oy, Siipitie 5–7, 01530 Vantaa, Finland. Tel. +358 20 510 1900, email: sales@jetflite.fi For further information, including the exercise of your rights, please e-mail us. We respond in timely manner and in any event within any applicable legal time limits.
The Purposes of Processing	Enhance sales by marketing Jetflite’s business flights and services and manage customer relationships
Legal Basis for Processing	Legal basis for marketing is <i>legitimate interest</i> : to promote sales. Legal basis for sales is <i>contract</i> .
Categories of Personal Data Processed	Marketing: contact information including person or company name, email address and phone number. Sales: Client’s billing information (billing address, VAT number) and sometimes credit card information in addition to contact information.
Recipients of Personal Data	Data is not shared with any other entities.
International Transfers	Personal data is not transferred outside the EU/EEA.
Data Retention Period	Customer contact information will be deleted if customer has not been active with Jetflite for 10 years. Customer billing information is retained six years after the flight.
Right of Access, Rectification and Erasure/Restriction, Objection and Data Portability	<p>Under the General Data Protection Regulation (2016/679, “GDPR”), you have the:</p> <ul style="list-style-type: none"> <li>- Right to know if your personal data is processed, and if it is, have access to your personal data, as well as be provided with the information included in this privacy notice, and to receive a copy of your personal data, provided that this does not adversely affect the rights and freedoms of others. Only the first copy is free of charge (Ref. GDPR Article 15);</li> <li>- Right to have your inaccurate personal data rectified and incomplete personal data completed (Ref. GDPR Article 16)</li> <li>- Right to have your personal data erased without undue delay, if (a) the data is no longer necessary for the stated purposes; (b) you withdraw your consent, where processing was justified only by consent; (c) you object to the processing pursuant to Article 21(1) of the GDPR and there is no overriding legitimate interest, or Article 21(2) of the GDPR; (d) your personal data has been unlawfully processed; (e) erasure is necessary for compliance with applicable laws; or (f) your personal data was collected in relation to the offer of information society services (Ref. GDPR Article 17).</li> <li>- Right to obtain restriction of processing of your personal data, if (a) you contest the accuracy of your personal data (for a period enabling us to verify the accuracy of the personal data); (b) the processing is unlawful and you request restriction instead of erasure; (c) we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; (d) you have objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether our legitimate grounds override yours (Ref. GDPR Article 18).</li> <li>- Right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another</li> </ul>

	<p>controller, if (a) the processing is based on consent or on a contract; and (b) the processing is carried out by automated means (Ref. GDPR Article 20).</p> <p>IMPORTANT: Only the main content of these rights has been summarized here. Please refer to the GDPR and/or local laws for full content. Restrictions to these rights as allowed by the GDPR and/or local applicable laws may apply.</p> <p>To act on your request, we need to have sufficient certainty of your identity. We therefore kindly advise you to be prepared to provide requested reasonable information to enable us to identify you.</p> <p>Please note that where requests are manifestly unfounded or excessive (as shown by us), we may either charge reasonable administrative fees for handling a request or refuse to act on it.</p>
<p>Right to Withdraw Consent</p>	<p>Where processing of your personal data is based on consent, you have a right to withdraw that consent anytime by notifying us of your withdrawal as instructed in the contact details section above. Please note that withdrawal does not affect the lawfulness of processing prior to withdrawal.</p>
<p>Right to Lodge a Complaint</p>	<p>You are entitled to lodge a complaint with the competent supervisory authority (tietosuojavirasto) if you doubt that we are not processing your personal data legally or otherwise fail to fulfil our legal obligations related to processing your personal data, or if you have other reasons to do so.</p>
<p>Necessity of Processing and Consequences of failure to provide personal data</p>	<p>The provision of personal data for marketing is <i>contractual requirement</i> and for marketing <i>necessary to enter into a contract</i>.</p> <p>If customer refuses to provide the personal data, Jetflite may not be able to make tailored offers to the customer and the data subject will not receive targeted marketing material or a flight cannot be sold to the client.</p>
<p>Automated Decision-Making</p>	<p>No automated decision-making, including profiling, is related to this processing activity.</p>
<p>Source of Personal Data</p>	<p>Data is collected from individuals and publicly available information.</p>