

## PRIVACY POLICY

Effective Date: 01 December 2019

### Corporation Data Protection and Privacy Principles

HandlingServices BV, its subsidiaries and affiliates (collectively, "HandlingServices") are committed to safeguarding the personal information of our customers, business partners, and employees. The following Data Protection and Privacy Principles (the "Privacy Principles") outline how HANDLINGSERVICES may collect, use, share, transmit, maintain, and store (collectively, "process") information that relates to an identified or identifiable individual ("personal information"), and the choices that may be available to you regarding your personal information. Under these Privacy Principles, "you" and "your" means any individual customer, business partner, or employee of HANDLINGSERVICES and any other individual whose personal information we process, and "we", "us", and "our" refer to HANDLINGSERVICES.

Please read the following carefully to understand our views and practices regarding your personal information and how we may treat it. For more information, or if you have any questions and/or are eligible to submit a subject access request, please reach out to us using the contact details found below.

### Collection, Notice, and Processing of Personal Information

We only collect personal information when provided by the client as appropriate and using only fair and lawful methods. We will process your personal information fairly and for purposes permitted by you and/or as permitted by applicable law. If requested, and/or where is not clear from the HANDLINGSERVICES product or service that you utilize or from your relationship with us, we may inform you about how your personal information is processed and the rights and remedies you have under our Privacy Principles. In addition, where permitted under applicable law you may object to certain types of processing. The HANDLINGSERVICES business(es) with which you transact provide notifications regarding the collection and processing of personal data and such notices may be found in the HANDLINGSERVICES Data Privacy Center.

### Data Security and Confidentiality

We will keep your personal information confidential and limit access to your personal information to those who specifically need it to conduct their business activities and to ensure smooth operations, except as otherwise permitted by applicable law. We have implemented industry standard measures to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. We will only use the provided data for industry purposes and no other means.

### **Choices Regarding How We May Use and/or Disclose Personal Information**

We strive to provide you with choices regarding the personal information you provide to us, including giving you the option of having your personal information included or removed from lists/systems used by HANDLINGSERVICES. We will not use any information provided for marketing purposes or any other activity not related to your assignment(s).

### **Accessing and Maintaining Personal Information**

Depending on your country or residence and/or citizenship, under applicable laws such as the EU General Data Protection Regulation ("GDPR"), you may also have the right to demand access to, review and change, and request deletion of the personal information that you have provided to us. Please note, however, that we may not always be able to accommodate your request to change or delete information if we believe doing so would cause the information to be incorrect, if we have a legitimate business purpose to retain that information, and/or if doing so might violate other legal obligations.

### **Transferring Personal Information**

We will comply with the GDPR and will comply with applicable legal requirements. We have adequate measures in place to provide protection for the international transfer of Personal Information. These measures include, among others, contractual obligations for recipients to handle and protect the personal information in accordance with standard contractual clauses developed by the European Commission.

### **Accountability**

HANDLINGSERVICES takes its data privacy obligations very seriously, and its employees may only process your personal information in accordance with these Privacy Principles, for which we conduct training and review compliance. Employees who violate these Privacy Principles may be subject to disciplinary action, up to and including termination.

### **Privacy Notice**

*What information do we collect about you?*

#### Information you give us

We collect information about you when you become a client and make use of our services and/or remit payment for services. We also collect information about you if you interact with us via phone or e-mail.

The types of information that you may give us vary depending on the specific entity with which you are doing business and/or the particular services requested. For example, you may be purchasing our trip planning services and/or related products. The information you may give us could include categories such as, but not limited to, your name, work or personal address, e-mail address, phone number, date of birth, gender, financial and/or credit card information, passport or driving license information, Social Security Number, national ID number, personal description and/or photograph, as well as customer data, payment data, employee data and/or website user data.

#### Information we receive from other sources

We may receive information about you if you use any of the other websites we operate or the other services we provide. We also work closely with third parties (including, for example, business partners, sub-contractors, payment and delivery services, search information providers, and credit reference agencies) and may receive information about you from them.

#### *How do we use the information about you?*

We use your information to provide you with information, process orders for products and services that you request from us, and administer or otherwise carry out our obligations in relation to any agreement you have with us. The Company retains your information for the period necessary to serve a legitimate purpose or as required by law.

If at any time you wish us to stop using your information for any the above purposes, please contact us using the methods explained below. We will stop the use of your information for such purposes as soon as it is reasonably possible to do so.

#### *How do we share your information?*

We may share your personal information with other members of our companies and with selected third parties for the performance of any contract we enter into with them or you. These third parties will not use your personal information for any other purposes than what we have agreed to with them, and we request those third parties to implement adequate levels of protection in order to safeguard your personal information.

Since the Company operates globally, the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). For example, it may be processed by staff operating outside the EEA who work for us, our subsidiaries, or for one of our suppliers in relation to the fulfilment of your order. While the information is under our control, the Company seeks to ensure that your personal information receives the same level of protection as it would had it stayed within the EEA, including seeking to ensure that it is kept secure and used only in accordance with our instructions and for legitimate purposes.

In the event we go through a business transition, such as a merger, acquisition of another company, or sale of part or all of our assets, we may disclose your personal information to third parties and your personal data held may be among one of the assets transferred.

We may also automatically collect non-personal information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to us. You cannot be identified from this information and it is only used to assist us in providing effective services, including in connection with this website.

Finally, we may be under a duty to disclose or share your personal information for various other reasons, such as to comply with a legal obligation; to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This could include, for example, exchanging information with a law enforcement agency or regulator; or with companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Potential rights under the GDPR**

Under the EU General Data Protection Regulation ("GDPR"), if you are a citizen or resident of an EEA country or Switzerland, you may have certain rights regarding your personal information:

- Right to access information maintained about you;
- Right to ensure your data is accurate and complete;
- Right to erasure, or the right to be forgotten;
- Right to restriction or suppression of personal data;
- Right to data portability;
- Right to withdraw consent if consent was previously provided; and
- Right to raise a complaint to the Information Commissioner's Office.

If you are eligible to invoke one of the rights listed above and wish to do so, you may contact us as part of a subject access request using the details found below. Please note that we may not always be able to fulfill your request as there may be legitimate purposes, such as certain legal or statutory obligations, that require us to retain your information as stored or if we believe the change would cause the information to be incorrect.

### **Updates to our Privacy Notice**

As appropriate, we may make changes to this Privacy Notice that will be posted online and, where appropriate, be sent to you by e-mail. Please check back frequently to remain aware of any updates or changes to this Privacy Notice.

### **How to contact us**

If you have additional questions, or believe you are eligible to submit a subject access request, you can reach us by email at [erik.degraaf@handlingservices.aero](mailto:erik.degraaf@handlingservices.aero) or by post at:

HandlingServices BV (Attn: Erik de Graaf)  
Padoxlaan 4  
2361 KS Warmond  
The Netherlands,

Please be advised that upon receipt of a formal complaint regarding the processing of personal data, we try to resolve it directly with the person who has made the complaint. However, as necessary, we will work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding our processing of personal data that we cannot resolve with a complainant directly.