

# **Privacy Policy**

#### Last Updated: 01 November 2019

This Privacy Policy applies to FlyEgypt ("FT"). FT is a corporation registered in the Arab Republic of Egypt with company number 74243 and a registered office at 1 Gad El Haq, block 1226, Heliopolis, Egypt. This website operated by FT.

In this policy;

- a) "you" and "your" are references to a user of our website or to any other individual whose personal data we process in the course of providing our services; and;
- b) references to your "personal data" or "Customer Data" are references to information which identifies you or could be used to identify you, such as your name and contact details, your travel arrangements and purchase history. It may also include information about how you use our website. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data as "processing" such personal data.

For the purposes of data protection legislation flyEgypt is considered a controller of personal data.

We collect, use and disclose Customer Data (as defined below) in order to provide you with a smooth, safe and efficient experience with us. The collection, use and disclosure of Customer Data enables us to provide services and products that are required to meet your needs and requirements. This Privacy Policy outlines our policy and responsibility in relation to the collection, use and disclosure of Customer Data. By continuing to use our services, you signify that you have read and understood this Privacy Policy.

### What information do we collect about you?

We collect information when you purchase flights or other products on our website or when you travel with us, such as your contact details, travel information and credit card details. In addition, we collect device and technical information from you, and any other information you may submit when you use our website.

### How will we use the information about you?

We use your information to fulfil our contract of carriage with you or otherwise deliver any other products or services you have requested for or signed up to. We only use your passport number and other national identification information where this is required by law, or where we need to verify individual identities to a high degree of fidelity to prevent fraudulent claims or transactions. We will only do so where we have assessed that there is no suitable alternative to collecting or using such national identification information, and that a failure to accurately identify an individual to a high degree of fidelity could pose significant safety or security risks, or a risk of significant impact or harm to any individuals or to us. In addition, we use your information to market our products and services to you, and those of our group companies, partners and agents (with your consent where required by applicable laws).







#### Who do we share your information with?

We share your data with our third party service providers, to the extent necessary for them to provide their services, such as payment processors, tour operators and travel agents representing your booking with us, and ground-operating personnel. We use these third parties' services solely to process or store your information for the purposes described in this policy. We also share your information with other carriers who may help us provide our services if necessary, government bodies as required by applicable laws and your authorised representatives.

#### Where do we process your information?

Your personal information is safely stored on our servers in Germany. We transfer your information to airports and ground staff in destinations that you are flying to and where we operate. Our staff are located in our offices across various locations in the Arab Republic of Egypt.

## Transferring data outside of the EEA (for individuals located in the EU only)

Data that you submit via our website is sent to and stored on secure servers owned by or operated for us. Your personal data may occasionally be transferred to, and stored at, a destination outside the European Economic Area ("EEA") to a country not deemed to provide adequate protection of your information by the European Commission, and may also be processed by staff operating outside the EEA who work for us, or for one of our service providers, related companies, agents or contractors. Such transfers may be made in order to ensure our ability to deliver our service to you, or for the proper functioning of our website, or to assist in our security or fraud protection activities.

When we, or our permitted third parties, transfer your information outside the EEA, we or they will impose contractual obligations on the recipients of that data to protect your information to the standard required in the EEA. We or they may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. We do not generally rely on your consent as the legal basis for transferring your personal data to outside the EEA, however where we feel it is necessary or appropriate we may seek to rely on your consent as the legal basis for such processing. Where we do, you may withdraw your consent at any time in the manner described below.

# Your rights (individuals located in the EU only) At any time, you have the right:

- to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- to request access to or a copy of any personal data which we hold about you;
- to rectification of your personal data, if you consider that it is inaccurate;
- to ask us to delete your personal data, if you consider that we do not have the right to hold it;
- to withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);







- to ask us to stop or start sending you marketing messages (e.g. our newsletter) at any time by using the unsubscribe link
  available in our correspondence or by email us directly at <a href="feedback@flyegypt.com">feedback@flyegypt.com</a> and requesting we remove you from our
  marketing correspondence;
- to restrict processing of your personal data;
- to refuse data portability (moving some of your personal data elsewhere) in certain circumstances;
- to object to your personal data being processed in certain circumstances; and
- to not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data;

Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change. We will correct any incorrect or incomplete information and will stop processing your personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

#### How long do we keep hold of your information?

We retain your information for as long as it is necessary to fulfil the purpose for which it was collected, for the legal or business purposes of FT, or as required by applicable laws. We will usually keep your Customer Data for up to 7 years to ensure that any contractual disputes can be addressed. For EU and Swiss residents, we will endeavour to delete your Customer Data within 30 days of a request for erasure, or contact you if it will take longer.

#### How do we secure your information?

FT uses up to date industry procedures to protect your personal information from unauthorized access, use, disclosure or loss. When booking a flight with the personal information provided to us, such information is held securely on servers in Germany which use security measures that are consistent with EEA and EU regulations.

If your browser supports SSL, please select the Secure Mode option while accessing our website. If you are restricted by the capabilities of your browser, then we advise that you update your browser to the latest version or use a different browser that support SSL connections.

#### How do we use cookies?

FT sets cookies and similar technology on your device to obtain information about how you access and use its website. This helps us provide you with a good experience and allows us to improve the website. Unless you have adjusted your browser settings so that it will refuse cookies, our website will set cookies when you load and navigate them.







#### What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website during your browsing session or on each subsequent visit, or to another website that recognises that cookie. The cookies we set do lots of different jobs, like help us to improve our website and deliver a better and more personalised service, remember your preferences, and generally improve the user experience. You can find more information about cookies at http://www.allaboutcookies.org/.

### Refusing or restricting cookies

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. The "Help" or "Internet Settings" functions within your browser should tell you how. Please be aware that if you select to refuse or restrict cookies you may be unable to access certain parts of our website.

### **Dispute Resolution and Contact information**

If you have any questions or queries, please contact us on <u>feedback@flyegypt.com</u>. For other ways of getting in touch with us, please visit https://fly.eg/p/faqs.

## How will we notify you of changes?

We will amend this Privacy Policy from time to time and the updated versions will be posted on our website and date stamped so that you are aware of when the Privacy Policy was last updated. Please check back frequently to see any updates or changes to this Privacy Policy. If we make any material changes to this Privacy Policy, we will provide notice on our website.

— End of Privacy Policy



