AIRIDEA S.R.L. AND AIS AIRLINES B.V.

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

pursuant to articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")

PREAMBLE

This Privacy Notice on the processing of personal data (hereinafter the "Notice") is provided pursuant to arts. 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("GDPR") by Airidea S.r.l. and AIS Airlines B.V., acting as Joint Controllers pursuant to art. 26 GDPR (hereinafter, jointly, the "Joint Controllers"). By means of a specific internal arrangement drawn up pursuant to art. 26 GDPR, the Joint Controllers have determined their respective responsibilities for compliance with the obligations under the GDPR, in particular as regards the exercise of the data subject's rights and their respective duties to provide the information referred to in arts. 13 and 14 GDPR. The essence of that arrangement is available on request by writing to the contact details set out in § 13 of this Notice. Your personal data will be processed in accordance with the principles of fairness, lawfulness, transparency, purpose limitation and storage limitation, data minimisation and accuracy, integrity and confidentiality, as well as the principle of accountability under art. 5 GDPR.

1. JOINT CONTROLLERS

The Joint Controllers of the processing of your personal data are:

Airidea S.r.l. Registered office: Via Roma 11/4, 16121 Genova (GE), Italy VAT no.: 10010420965 E-mail: booking@airidea.it
AIS Airlines B.V. Registered office: Flamingoweg 20, 8218 NW Lelystad, the Netherlands E-mail: info@aisairlines.com
The Joint Controllers have designated the following e-mail address as the single point of contact for data subjects: booking@airidea.it. Data subjects may in any event exercise their rights against each Joint Controller by sending their request to the contact details set out in § 13.

2. DATA PROTECTION OFFICER (DPO)

The Joint Controllers have started the procedure for appointing the Data Protection Officer (DPO) pursuant to arts. 37-39 GDPR. The appointment will be finalised in the coming months.
As soon as the appointment is formalised, the DPO's contact details will be:

- published on the Joint Controllers' website;
- made available at the registered office of each Joint Controller;
- communicated by updating this Notice pursuant to § 14.

Pending the appointment, any question relating to the protection of personal data may be addressed to the single point of contact indicated in § 13.

3. CATEGORIES OF PERSONAL DATA PROCESSED

The Joint Controllers collect and process the following categories of personal data (hereinafter, jointly, the "Personal Data"):

- **Identification and contact data:** first name, surname, date of birth, gender, postal address, landline and/or mobile telephone number, e-mail address, login credentials for the personal area of the website. Where necessary, such data may also relate to the holder of parental responsibility.

- **Transaction data:** information on transactions carried out (history), flights purchased or booked, additional services purchased, activities carried out and transactions concluded with Programme Partners.
- **Interests and preferences data:** information voluntarily provided regarding travel preferences, the name of the company you work for, professional status, preferred contact methods, membership of loyalty programmes of other carriers or other parties.
- **Browsing data:** information on how you use the Site and open or forward the Joint Controllers' communications, including information collected through cookies and similar technologies. For detailed information on the types of cookies used, their purposes and how to manage them, please refer to the Cookie Policy available at the following link: [www.airidea.it/cookie-policy].

Personal Data are, as a rule, collected directly from the data subject when registering on the website, booking or purchasing flights and related services. In some cases, the Joint Controllers may receive Personal Data from independent controllers (e.g. travel agencies, Global Distribution Systems, business partners), in compliance with the applicable provisions.

Processing of minors' data. The Joint Controllers' services are not intended for persons under 18 acting on their own. Where it is necessary to process minors' data in the context of flight bookings (e.g. accompanied minors), the processing takes place exclusively through the holder of parental responsibility, who is required to give consent on the minor's behalf where required. The Joint Controllers do not knowingly collect personal data directly from persons under 18 for marketing or profiling purposes.

4. HOW PERSONAL DATA ARE COLLECTED

The Joint Controllers collect and process Personal Data in the following circumstances:

- registration on the website via the online form;
- booking or purchase of flights and related services, including through telephone channels or authorised agencies;
- use of the personal area of the website and of the Joint Controllers' applications;
- communications with customer service;
- browsing the website, through cookies and similar technologies (see Cookie Policy);
- participation in promotional initiatives or loyalty programmes.

If you provide Personal Data of third parties who have given their prior consent, you must ensure that such persons have read this Notice before their data are communicated.

5. PURPOSES AND LEGAL BASES OF THE PROCESSING

Personal Data are processed by the Joint Controllers for the following purposes, on the basis of the respective legal basis.

a) Operational management of the booking/purchase of flights and strictly related purposes

The Joint Controllers process identification and contact data, transaction data and interests and preferences data in order to:

- follow up and manage the request for registration, booking or purchase of flights and related services, including verification of the data relating to the holder of parental responsibility where applicable;
- send service communications relating to the flight (e.g. booking confirmation, check-in, schedule changes, cancellations);
- fulfil any contractual obligation and handle requests relating to flights;
- check and correct any errors in the data provided, to the extent necessary for the proper performance of the service.

Legal basis: performance of a contract to which you are a party or performance of pre-contractual measures taken at your request, pursuant to art. 6(1)(b) GDPR.

b) Compliance with legal obligations

The Joint Controllers process Personal Data to comply with the legal obligations to which they are subject, including tax, accounting, air transport security, anti-money laundering and counter-terrorist financing obligations, and to comply with requests from public authorities empowered by law.

Legal basis: compliance with legal obligations to which the Joint Controllers are subject, pursuant to art. 6(1)(c) GDPR.

c) Direct marketing by the Joint Controllers

Subject to your express and specific consent, the Joint Controllers process identification and contact data to send promotional and marketing communications relating to the Joint Controllers' own products and services, including newsletters, promotional offers, loyalty programmes, discounts and commercial initiatives, by means of:

- **automated tools:** e-mail, SMS, MMS, push notifications, instant messaging (e.g. WhatsApp), fax, telephone without operator, social networks;
- **non-automated tools:** paper mail, telephone with operator.

You may at any time object to processing for marketing purposes or withdraw the consent given, also in part (e.g. by objecting only to automated tools), pursuant to arts. 7 and 21 GDPR, by contacting the Joint Controllers at the contact details set out in § 13 or by using the unsubscribe link at the bottom of each electronic communication.

Legal basis: express and specific consent of the data subject, pursuant to art. 6(1)(a) GDPR. Refusal to give consent neither precludes nor affects the use of the flight services.

d) Marketing by third-party business partners

Subject to your express and specific consent, separate from that referred to in letter c), the Joint Controllers process identification and contact data to send promotional communications relating to products and services of selected business partners in the following sectors: telecommunications, retail, energy, food, finance, automotive, textiles and fashion, transport. Communications may be sent through the same channels indicated in letter c). Consent for this purpose is distinct from consent for the Joint Controllers' direct marketing and may be given or withdrawn independently. The business partners to whom the data may be disclosed are identified in the list available at the Joint Controllers' registered office and on written request to the contact details set out in § 13.

Legal basis: express and specific consent of the data subject, pursuant to art. 6(1)(a) GDPR. Refusal to give consent precludes neither the use of the services nor any consent to the Joint Controllers' direct marketing referred to in letter c).

e) Profiling

Subject to your express and specific consent, the Joint Controllers carry out automated processing of Personal Data, including identification data, transaction data and interests and preferences data, in order to analyse your travel habits and preferences, build a personalised profile and send you commercial communications and offers tailored to your interests (hereinafter "Profiling").

Profiling consists of the automated analysis of information such as: preferred destinations, purchase frequency, usual price range, additional services purchased, preferred contact channels. On the basis of that analysis, the Joint Controllers may:

- personalise offers and commercial communications;
- propose dedicated offers within loyalty programmes;
- carry out market research and internal statistical analyses.

Profiling does not produce legal effects concerning you or similarly significantly affect you within the meaning of art. 22 GDPR: it does not determine access to or denial of services, does not influence contractual conditions and does not generate binding automated assessments. Should the Joint Controllers in future intend to

adopt automated decision-making processes with significant legal effects, this Notice will be updated and specific consent will be requested pursuant to art. 22 GDPR.

You have the right to withdraw your consent to Profiling at any time, without affecting the lawfulness of processing carried out before the withdrawal.

Legal basis: express and specific consent of the data subject, pursuant to art. 6(1)(a) GDPR. Refusal to give consent does not preclude the use of the services.

f) Website security, fraud prevention and protection of IT systems

The Joint Controllers process browsing data and, where necessary, identification and contact data to ensure the security of the website and IT systems and to prevent unauthorised access, fraud, phishing attempts and other unlawful activities. The processing is limited to what is strictly necessary to pursue that purpose.

Legal basis: pursuit of the Joint Controllers' legitimate interest in protecting the security of their systems and preventing unlawful acts, pursuant to art. 6(1)(f) GDPR, following a balancing test against the rights and freedoms of data subjects. That interest has been deemed to prevail in view of the defensive nature of the processing and its limitation to strictly necessary data.

g) Defence of rights in judicial, administrative and out-of-court proceedings

The Joint Controllers process Personal Data to establish, exercise or defend a right in judicial, arbitral, administrative or out-of-court proceedings, including in relation to disputes arising in connection with flights and related services.

Legal basis: pursuit of the Joint Controllers' legitimate interest in protecting their rights, pursuant to art. 6(1)(f) GDPR.

6. MANDATORY OR OPTIONAL NATURE OF PROVIDING DATA

Purpose	Nature of provision	Consequences of refusal
Flight operations (§ 5a)	Mandatory	Impossibility of concluding the booking/purchase
Legal obligations (§ 5b)	Mandatory	Impossibility of complying with legal obligations; possible penalties
Direct marketing (§ 5c)	Optional	No consequence for the services
Partner marketing (§ 5d)	Optional	No consequence for the services
Profiling (§ 5e)	Optional	No consequence for the services; offers not personalised
Security/anti-fraud (§ 5f)	Not applicable (legitimate interest)	-
Legal defence (§ 5g)	Not applicable (legitimate interest)	-

7. SECURITY OF PERSONAL DATA

The Joint Controllers adopt technical and organisational measures appropriate to the risk, pursuant to art. 32 GDPR, to ensure the security, integrity and confidentiality of Personal Data and to protect them against unauthorised access, loss, destruction or unlawful disclosure.

Personal Data are stored on secure servers located within the European Union, managed by the Joint Controllers or by service providers acting as Processors pursuant to art. 28 GDPR, in compliance with the Joint Controllers' security standards.

Where the Joint Controllers have provided the data subject with (or the data subject has chosen) a password to access the personal area of the website or applications, the data subject is responsible for keeping that password secret and for adopting the security measures indicated by the Joint Controllers.

In the event of a personal data breach likely to result in a high risk to the rights and freedoms of data subjects, the Joint Controllers will notify the breach to the data subjects concerned without undue delay, pursuant to art. 34 GDPR, subject to the exceptions provided for by the applicable legislation.

8. RETENTION OF PERSONAL DATA

The Joint Controllers retain Personal Data for the time strictly necessary to achieve the purposes for which they were collected, in compliance with the storage limitation principle under art. 5(1)(e) GDPR.

Purpose	**Retention period**
Flight operations (§ 5a)	10 years from the date of termination of the contractual relationship, in compliance with the civil-law, accounting and tax obligations laid down by the applicable legislation
Legal obligations (§ 5b)	For the period laid down by the legislation applicable from time to time
Direct marketing (§ 5c)	24 months from the collection of consent, unless withdrawn earlier. The Joint Controllers will periodically renew consent as described in § 5c
Partner marketing (§ 5d)	24 months from the collection of consent, unless withdrawn earlier
Profiling (§ 5e)	The Joint Controllers will periodically renew consent by e-mail to the registered address; if no confirmation is received within 30 days of the renewal notice, the profiling data will be deleted or anonymised
Security/anti-fraud (§ 5f)	For the time strictly necessary to pursue the security purpose and in any event no longer than 12 months from collection, unless longer retention is documented as necessary
Legal defence (§ 5g)	For the time necessary to settle the proceedings or dispute, including the applicable limitation periods

Personal Data that are no longer necessary, or for which there is no longer a legal basis for retention, are irreversibly anonymised or securely destroyed.

9. RECIPIENTS OF PERSONAL DATA

Personal Data may be disclosed or made accessible to the following categories of recipients:

- **Internally authorised persons:** employees and collaborators of the Joint Controllers authorised to process data pursuant to art. 29 GDPR and art. 2-quaterdecies of the Italian Privacy Code (e.g. staff handling bookings, customer service, information systems management);
- **Processors under art. 28 GDPR:** third parties providing services on behalf of the Joint Controllers, such as: IT infrastructure and cloud service providers; IT support and consultancy companies; booking platform providers (Global Distribution Systems);

payment service providers and banks; companies providing and managing customer service; companies carrying out market analysis and data development; communication and marketing service providers;

- **Commercial partners for third-party marketing (§ 5d):** exclusively subject to your specific consent and within the limits of that consent. The updated list of partners is available on request at the contact details set out in § 13;
- **Public authorities and supervisory bodies:** entities and authorities to which Personal Data must be disclosed under statutory provisions (e.g. civil aviation authorities, tax authorities, police forces, judicial authorities);
- **Law firms and consultants:** for the protection of the Joint Controllers' rights in judicial, arbitral or out-of-court proceedings, acting as independent controllers or as processors depending on the specific case.

The Joint Controllers keep an updated list of Processors, available at their respective registered offices and on written request to the contact details set out in § 13.

Personal Data will not be disseminated indiscriminately to unspecified parties.

10. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

To carry out certain processing activities, the Joint Controllers may transfer Personal Data to parties located in countries outside the European Union (EU) or the European Economic Area (EEA) (hereinafter "Third Countries").

Any transfer to Third Countries takes place in compliance with arts. 44 et seq. GDPR and on the basis of one of the following appropriate safeguards:

- Adequacy decision of the European Commission for the country of destination (e.g. the adequacy decision for the United States under the EU-US Data Privacy Framework, adopted on 10 July 2023);
- Standard Contractual Clauses (SCCs) approved by the European Commission, supplemented where appropriate by additional measures in accordance with EDPB Recommendations 01/2020 adopted on 10 November 2020;
- Binding Corporate Rules (BCRs) approved by the competent supervisory authority;
- Other appropriate safeguards provided for by the GDPR.

Further information on the transfers carried out and the safeguards adopted may be requested by writing to the contact details set out in § 13.

11. AUTOMATED DECISION-MAKING AND PROFILING

The Joint Controllers carry out Profiling as described in § 5e, exclusively subject to your specific consent.

Profiling is aimed at personalising commercial communications and does not produce legal effects concerning you or significantly affect you within the meaning of art. 22(1) GDPR. In particular:

- **Logic involved:** the analysis is carried out through automated processing of historical data on transactions, travel preferences and browsing behaviour, with the aim of identifying recurring patterns and associating the data subject with interest categories (e.g. frequent traveller, preferences for certain destinations or price ranges);
- **Significance and consequences:** the outcome of Profiling is used exclusively to personalise commercial offers and marketing communications. It does not influence access to flight services, the fares applied to the contract of carriage or any decision with legal or similarly significant effects on the data subject.

Should the Joint Controllers in future intend to adopt decision-making processes based solely on automated processing with legal or similarly significant effects, they will update this Notice, request the data subject's explicit consent pursuant to art. 22 GDPR and ensure the safeguards provided for therein (human intervention, the right to express one's point of view, the right to contest the decision).

You have the right to object to Profiling at any time pursuant to art. 21 GDPR, by writing to the contact details set out in § 13.

12. YOUR DATA PROTECTION RIGHTS

Under the conditions laid down by the GDPR, you have the right to request from each Joint Controller at any time:

- **Right of access (art. 15 GDPR):** to obtain confirmation as to whether or not data concerning you are being processed and, where that is the case, access to the data and to the information on the processing, and a copy of the data;
- **Right to rectification (art. 16 GDPR):** to obtain the rectification of inaccurate Personal Data and the completion of incomplete data;
- **Right to erasure (art. 17 GDPR):** to obtain the erasure of Personal Data in the cases provided for by law (the so-called "right to be forgotten"), subject to the statutory exceptions;
- **Right to restriction of processing (art. 18 GDPR):** to obtain the restriction of processing in the cases provided for by law;
- **Right to data portability (art. 20 GDPR):** to receive, in a structured, commonly used and machine-readable format, the Personal Data concerning you that you have provided to the Joint Controllers, for processing based on contract or consent and carried out by automated means, and to have them transmitted directly to another controller where technically feasible;
- **Right to object (art. 21 GDPR):** to object at any time to the processing of Personal Data for direct marketing purposes (including profiling related to marketing), with absolute and immediate effect; to object, on grounds relating to your particular situation, to processing carried out for the pursuit of the Joint Controllers' legitimate interest;
- **Right relating to automated decisions (art. 22 GDPR):** not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you, except in the cases provided for by law and with the safeguards laid down therein;
- **Right to withdraw consent (art. 7 GDPR):** to withdraw at any time the consent given for the purposes requiring it (direct marketing, third-party marketing, profiling). Withdrawal does not affect the lawfulness of processing carried out before it.

Right to object to marketing. You may at any time object to processing for the direct marketing purposes of the Joint Controllers and/or third-party partners, also in part (e.g. only for certain communication channels), by contacting the Joint Controllers at the contact details set out in § 13 or by using the unsubscribe link at the bottom of each electronic communication.
How to exercise your rights. To exercise the rights listed above, simply send a written communication to the contact details set out in § 13, stating your first name, surname and a brief description of the request. The Joint Controllers do not request any information beyond what is strictly necessary to identify the requester and respond to the request. The Joint Controllers will reply without undue delay and in any event within one month of receipt of the request. That period may be extended by a further two months for particularly complex or numerous requests; in that case, the data subject will be informed of the extension and of the reasons for it within the first month.
Right to lodge a complaint. If you consider that the processing of your Personal Data infringes the GDPR, you have the right to lodge a complaint with the competent supervisory authority. For data subjects resident in Italy: Garante per la protezione dei dati personali (www.gpdp.it). For data subjects resident in the Netherlands

or in other EU Member States, the competent authority is the supervisory authority of the country of habitual residence, place of work or place of the alleged infringement. You also have the right to bring proceedings before the competent courts.

13. CONTACT DETAILS OF THE JOINT CONTROLLERS

To exercise your rights, request information on the processing of your data, or obtain a copy of the joint controllership arrangement or of the list of Processors, you may contact the Joint Controllers at the following contact details:

Airidea S.r.l. Via Roma 11/4, 16121 Genova (GE), Italy E-mail: booking@airidea.it *(single point of contact for the exercise of rights)*
AIS Airlines B.V. Flamingoweg 20, 8218 NW Lelystad, the Netherlands E-mail: info@aisairlines.com

14. UPDATES TO THIS NOTICE

The Joint Controllers reserve the right to amend or update the content of this Notice, in whole or in part, including as a result of changes in the applicable legislation, measures taken by the Garante or the EDPB, or changes to the processing activities carried out.

Any changes will be communicated to data subjects by means of a notice on the website and, where possible, by e-mail to the registered address, reasonably in advance of their entry into force. Continued use of the services after the changes have been communicated will constitute acceptance of the updated version of the Notice, without prejudice to the need to obtain new consent where required by the applicable legislation.

In particular, this Notice will be updated as soon as the appointment of the DPO referred to in § 2 has been finalised, with the relevant contact details.
The updated version of this Notice is always available on the Joint Controllers' website.

Genova / Lelystad, 10 September 2026

Airidea S.r.l., AIS Airlines B.V. *The Joint Controllers*