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you name it, we fly it!

DATA PROTECTION NOTICE

Cargolux Airlines International S.A., Luxembourg Airport, Luxembourg (hereinafter referred to as “Cargolux” or “We”) is committed to protecting the personal data of all those with whom we collaborate and provide services to (“You”), therefore, when processing your personal data, we act in accordance with data protection laws, especially the General Data Protection Regulation EU 2016/679 (the “GDPR”). This Data Protection Notice explains how your personal data are processed for the purpose of sending out and administering a marketing quiz context among Cargolux’s customers that have already subscribed to Cargolux’s newsletter and contacting the winner of such context for the allocation of the prize.

This Data Protection Notice may be modified to reflect changes on the use of our systems, to comply with legal amendments, or to integrate best practices.

✈ Who is the controller of your personal data?

Cargolux, acting as Data Controller is responsible for processing your personal data.

✈ What personal data will Cargolux process and why do we process it?

We may process your:

- contact information (email address).

The **legal basis** for the processing of your personal data is legitimate interest. The information we request from you is considered as the minimum necessary data enabling Cargolux to pursue the purposes described above.

✈ Who do we share your personal data with?

Your personal data may be shared internally, on a strict need to know basis. We may also communicate your personal data to law enforcement or other government and regulatory bodies or agencies, upon request and to the extent permitted by law; and certain regulated professionals such as lawyers or auditors mandated by Cargolux.

✈ Where do we transfer your personal data?

Your personal data are processed within the European Union. In case of international transfers originating from the EU/EEA to a country outside the EU/EEA, the transfer of your personal data may



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occur where the European Commission has determined that the country outside the EU/EEA ensures an adequate level of data protection. For transfers to countries outside the EU/EEA for which the level of protection has not been recognized as adequate by the European Commission, Cargolux will implement appropriate safeguards provided for by current data protection law (e.g. the entry into standard data protection clauses) or rely on a derogation applicable to specific situations.

✈️ **Security of your personal data**

The processing of your personal data is carried out through IT, automated and manual tools strictly related to the aforementioned purposes and, in any event, in compliance with the appropriate technical and organizational measures required by law to ensure a level of security that is adequate to the risk, in order to avoid unauthorized loss or access to your data.

✈️ **For how long do we keep your personal data?**

Unless a longer retention period is required (e.g., as necessary to defend our rights in the scope of investigations, disputes or legal claims) or permitted by law, your personal data will only be stored for the period in which this context will be active and until the winner has been contacted and no later than 31st of August, 2022.

✈️ **What are your rights?**

In accordance with applicable data protection laws (and subject to conditions and restrictions set forth therein), you may exercise at any time the following rights in relation to your personal data:

- **Right to access**, which enables you to obtain from us confirmation of whether your personal data are being processed or not and, if so, obtain access to such data;
- **Right to rectification**, which enables you to obtain from us the correction and/or integration of any of your personal data that are incorrect and/or incomplete; and

In certain limited cases (where we will need to analyze whether the conditions for the exercise of such rights are fulfilled):

- **Right to erasure**, which enables you, in specific cases provided for by art. 17 GDPR, to obtain from us the erasure of your personal data;
- **Right to restriction of processing**, which enables you, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by us;



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- **Right to object**, which enables you to object to the processing of your personal data when certain conditions are met;
- **Right to data portability**, which enables you, in certain cases (subject in particular to technical feasibility) and only with regard to the data you have provided to us, to request receipt of your personal data in a structured and commonly machine-readable format.

If you have provided your consent to the processing of your personal data, you can withdraw such consent at any time.

To exercise any of these rights, you may contact us by email dataprotection@cargolux.com.

You have the right to lodge a formal complaint with the relevant Data Protection Authority (in Luxembourg, Commission nationale pour la protection des données "CNPD").