**Data protection declaration**

Executive Travel Airport SA ("**we**"), as data controller, is responsible for collecting and processing your personal data in the course of its activities.

Our business is to offer a complete range of travel services to our customers.

The purpose of this data protection declaration is to explain how we process your personal data and how you can control and manage it. Indeed, our data processing may be covered by other data protection regulations, such as those contained in the (travel) general conditions or may result from other circumstances, respectively be governed by law.

This data protection declaration complies with the requirements of Swiss data protection law as well as - if and to the extent applicable - the General Data Protection Regulation (GDPR) of the European Union.

# DOES THIS STATEMENT APPLY TO YOU?

This data protection declaration applies to you if you are:

1. one of our customers or in a contractual relationship with us;
2. a co-traveler of our customers;
3. a person interested in our products or services and provide us with your personal data (e.g. in an agency, on our websites and apps, at events) so that we can contact you.

When you provide us with personal data about other people, please be sure to inform them of the disclosure of such data and invite them to read this data protection declaration. We will do the same where possible (e.g. if we have the person's contact information).

# HOW CAN YOU CONTROL THE PROCESSING ACTIVITIES WE CARRY OUT ON YOUR PERSONAL DATA?

You have rights that allow you to exercise effective control over your personal data and how we process it. Below we explain your rights in relation to your personal data.

If you wish to exercise the rights listed below, please make a request by sending an email to direction@e-travel.ch or a letter to Avenue Louis Casai, 80. 1216 Cointrin/Genève..

If you have any questions about the use of your personal data in the context of this data protection declaration, please address them to: direction@e-travel.ch

* 1. **You can request access to your personal data**

If you wish to have access to your personal data, we will provide you with a copy of the personal data you have requested as well as information relating to its processing.

Your right of access may be limited in the cases provided for by laws and regulations.

* 1. **You can request the rectification of your personal data**

If you believe that your personal data is inaccurate or incomplete, you may request that such personal data be amended or supplemented accordingly. In some cases, supporting documents may be required.

* 1. **You can request the deletion of your personal data**

If you wish, you can request the deletion of your personal data, insofar as the law allows it.

* 1. **You can object to the processing of your personal data on the basis of legitimate interests**

If you do not agree with a processing activity on the basis of a legitimate interest, you may object to this, for reasons related to your particular situation, by informing us precisely of the processing activity concerned and the reasons for your objection. We will stop processing your personal data, unless there are compelling legitimate grounds to do so or the processing is necessary to establish, exercise or defend legal claims.

* 1. **You can object to the processing of your personal data for commercial prospecting purposes**

You have the right to object at any time to the processing of your personal data for commercial prospecting purposes, including profiling, insofar as it is related to such direct marketing.

* 1. **You can request that the use of your personal data be suspended**

If you question the accuracy of the personal data we use or if you object to the processing of your personal data, we will consider your request. You can ask us to suspend the use of your personal data while your request is being reviewed.

* 1. **You have rights against an automated decision**

As a matter of principle, you have the right not to be subject to a decision based solely on automated processing based on profiling or otherwise, which has a legal effect or significantly affects you. However, we may automate such a decision if it is necessary for entering into or performing a contract with us, if it is permitted by law or if you have given your consent.

In any case, you have the right to contest the decision, express your point of view and request the intervention of a competent person to review the decision.

* 1. **You can revoke your consent**

If you have given your consent to the processing of your personal data, you can revoke this consent at any time.

* 1. **You can request the portability of part of your personal data**

You may request a copy of the personal data you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that we pass this copy on to a third party.

* 1. **How do I lodge a complaint with the Federal Data Protection and Information Commissioner?**

In addition to the rights mentioned above, you can lodge a complaint with the competent supervisory authority: the Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, 3003 Bern.

# FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

* 1. **Execution of the contract and legitimate interest**

In this section, we explain for what purposes and on what legal basis we process your personal data. In the first place, we use your personal data to perform a contract to which you are a party or to take pre-contractual measures at your request. But we may also process your personal data to meet our legitimate interest or that of third parties.

 In particular, your personal data is processed when this is necessary for the conclusion or performance of a contract for:

* conclude a (travel) contract with you. We may process personal data in order to register you as a new customer, to conclude a contract and to perform it with you;
* provide you with the products and services contracted under the applicable contract;
* invoicing, invoicing and collection;
* provide you with services related to the preparation and execution of a trip;
* for insurance purposes;
* provide consulting services;
* provide assistance in case of difficulties during the journey if necessary;
* provide you with access to our digital platforms. We may process personal data when you use our digital platforms for multiple purposes (for example, to manage your personal information or to obtain access to travel information);
* provide access to our premises and facilities. We may process personal data when you visit us on our premises in order to carry out appropriate access and security control;
* communicate with you. We may process personal data when you wish to contact us, when you request information about our company or services or when the contract needs to be updated;
* respond to your requests and assist you;
* manage the termination of the contract.

Where we base a processing activity on a legitimate interest, we balance that interest against your interests or fundamental rights and freedoms to ensure a fair balance between them. As part of our business as a travel service provider, we use your personal data to: :

* **continue to develop our products and services;**
* strengthen cybersecurity, manage our platforms and websites, and ensure business continuity;
* implement information technology solutions;
* maintain operational information systems;
* improve the automation and efficiency of our business processes and customer services (e.g. automatic complaint completion, follow-up of your requests and improvement of your satisfaction based on personal data collected during our interactions with you, such as telephone records, emails or chats);
* exercise legal claims and defend ourselves in legal disputes and administrative proceedings;
* organize contests, promotional operations, conduct surveys and customer satisfaction surveys.

* 1. **Sales and marketing offers**

If you are one of our customers and unless you object, we may send you offers for our products and services. We will ensure that these commercial offers relate to products or services that match your needs and are complementary to those you already enjoy. You can object to this at any time.

* 1. **Consent**

For certain processing of personal data, we will provide you with specific information and ask for your consent. You can of course revoke your consent at any time.

In particular, we ask for your consent to:

* the transmission of sensitive personal data to third parties;
* personalisation of our offers and our products or services on the basis of more complex profiling in order to anticipate your needs and behaviours;
* any electronic offering of products and services not similar to those to which you have subscribed or products and services of our trusted partners.

We may ask you for additional consent to process your personal data if necessary, but this will not affect the data processing already carried out.

# WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We collect and use your personal data, i.e. any information that identifies you or allows you to be identified.

Depending in particular on the types of products or services we provide to you and the interactions we have with you, we collect different types of personal data about you:

* **Contact information**, Surname, first name, postal address (private or professional), email address, telephone number;
* **Personal** data, e.g. gender, date of birth and age, marital status, nationality, passport data, driving licence, etc.;
* **Lifestyle**, e.g. hobbies and interests, travel;
* **Travel information**, such as travel dates, itinerary/destination, airline, hotel, prices, customer wishes, information about your co-travelers, frequent flyer programs of airlines, hotels, railways, car rental, cruises, etc.;
* **Lifestyle**, e.g. hobbies and interests, travel;
* **Travel information**, such as travel dates, itinerary/destination, airline, hotel, prices, customer wishes, information about your co-travelers, frequent flyer programs of airlines, hotels, railways, car rental, cruises, etc.;
* **Data relating to your habits and preferences**, in relation to the use of our products and services (e.g. meal requests, eating habits, allergies, etc.);
* **Data** collected during our interactions with you, e.g. your comments, suggestions, needs collected during our exchanges with you in person in our agencies and during telephone conversations (interview note or interview recording), discussion by e-mail, chat, chatbot, exchanges on our pages on social networks and any complaints you may have. Your login and tracking data such as cookies and trackers for non-advertising or analytical purposes on our websites, online services, applications, social media pages;
* **Data relating to your devices** (mobile phone, computer, tablet, etc.), IP address, technical characteristics and identification data;
* **Personalized login credentials or security features,** used to log you in to our website and apps.

# FROM WHOM DO WE COLLECT PERSONAL DATA?

As a rule, we collect personal data directly from you. However, we may also collect it from other sources.

We sometimes collect data from public sources:

* publications/databases made available by official authorities or third parties (e.g. Official Gazette of Commerce, Commercial Register);
* websites/social media pages of legal entities or business customers containing information you have disclosed (e.g. your own website or social media page);
* public information, such as that published in the press.

We also collect personal data from third parties:

* our customers (e.g. co-travellers);
* our service providers (including overseas service providers);
* third parties, such as credit reference agencies and fraud prevention agencies;
* data brokers, who are required to ensure that they collect relevant information lawfully.
* Online phone book (local.ch, etc.)

# WITH WHOM DO WE SHARE YOUR PERSONAL DATA AND WHY?

In order to achieve some of the purposes described in this data protection declaration, in particular the organisation of a trip, we may, where appropriate, share your personal data with:

* our service providers in the destination country (e.g. agencies, guide, hotel reservation, transfer and possibly excursion service), transport service providers (airline, train, car rental, etc.) and accommodation operators (hotel, hostels, etc.);
* subcontractors who provide services on our behalf (e.g. IT services, support services, logistics, printing services, telecommunications, debt collection, consulting, distribution and marketing);
* certain regulated professions such as lawyers, notaries or auditors when necessary in specific circumstances (litigation, audit, etc.);
* partners for advertising, market and opinion research;
* partners who support us in solving offences (e.g. fraud), exercising or defending legal claims;
* official authorities and services (e.g. tax authorities, embassies of the country of destination) in case of legal or administrative obligation (e.g. retention obligations, obtaining visas, obtaining information on entry requirements).

# INTERNATIONAL TRANSFERS OF PERSONAL DATA

In the case of international transfers from Switzerland or the European Economic Area (EEA) to a non-EEA country (third country), your personal data may be transferred across borders. In particular, you should expect that your data will be transmitted to your destination countries, but also to other countries in Europe, the USA and the world where service providers commissioned by us are established. If the FDPIC or the European Commission has recognised that a third country offers an adequate level of data protection, your personal data may be transmitted on this basis.

For transfers to a third country where the level of protection has not been recognised as adequate by the FDPIC and the European Commission, we will rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary for the performance of our contract with you) or we will implement one of the following safeguards to ensure the protection of your personal data:

* the European Commission's standard contractual clauses approved by the FDPIC;
* binding corporate rules.

To obtain a copy of these guarantees or details of where they are available, you may send a written request as indicated in point 2.

# HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your personal data for as long as is required to fulfil our contractual obligations and to comply with applicable laws and regulations or for a different period of time, consistent with our legitimate business interests, such as proper bookkeeping and responding to legal claims or requests from authorities.

Your personal data is stored in our customer file. If you do not want us to store this data, please let us know.

# DATA SECURITY

We use appropriate technical and operational security measures to protect the personal data we store against manipulation, partial or complete loss and unauthorized access by third parties (e.g. encryption of data transmission, access controls, etc.). Our security measures are continuously improved in line with technological developments.

We take appropriate precautions to protect your data. However, the transmission of information via the Internet and other electronic means always poses security risks and we cannot guarantee the security of information transmitted in this way.

We are bound by professional secrecy.

# HOW CAN I MONITOR THE PROGRESS OF THIS DATA PROTECTION DECLARATION?

In a world where technologies are constantly evolving, we regularly review this data protection declaration and update it if necessary.

The current version published on our website is authoritative. We invite you to consult the latest version of this document online, and we will inform you of any changes through our website or our usual communication channels.