Privacy & Cookies Policy

This Privacy & Cookies Policy sets out the principles based on which we process Personal Data collected through this website (hereinafter the "Website").

This Privacy & Cookies Policy forms part of the <u>Terms and Conditions of Use</u>. Please read the Terms and Conditions of Use and this Privacy & Cookies Policy carefully before using the Website.

1. Definitions

"Personal Data", as used herein, means any and all information about an identifiable natural person or, to the extent required by law (e.g. in Switzerland), about an identifiable legal entity.

"We", "us" or "our", as used herein, refers to inflight Service Europe AB, as indicated in more detail in the imprint.

2. Processing of Personal Data

We process your Personal Data in order to complete any orders you may request and processing relating to such orders.

We will then refrain from further processing of your Personal Data, except to the extent the processing of your Personal Data is lawful for other reasons (e.g. as necessary to comply with legal obligations or to protect overriding interests of third parties or ourselves, such as, e.g., the uninterrupted availability of our website or enforcement of violations of law, always provided, this is in compliance with applicable data protection laws).

3. How do we process Personal Data?

Any Personal Data collected through the Website is processed in accordance with the provisions of applicable data protection laws. We collect and process Personal Data carefully and solely for the purposes described in this Privacy & Cookies Policy and to the extent necessary for the purposes described herein.

We always seek, to the extent reasonably possible, to collect information on an anonymized basis or to anonymize information after collection. "Anonymizing" means that there is, objectively and irreversibly, no possibility that such information could be linked to you or another identifiable person. Such anonymized information does *not* qualify as Personal Data.

4. What Personal Data do we collect via the Website?

Personal Data collected via the Website may include:

(a) Information which you actively provide:

We collect information which you actively provide through the Website – e.g. by providing your email address, name, address, phone number or other information about yourself or about another person or legal entity in an online form on the Website, in a blog or through any other function on the Website which can be used to provide information to us.

The providing of such Personal Data will always be voluntary. Without providing such information you may, however, not be able to use the service for which the information is requested.

(b) Information collected automatically through Cookies:

We collect additional information through so called <u>Cookies</u> whenever you are accessing the Website.

By way of example, through Cookies (i) we collect information about your computer, such as the IP address (a unique number attributed to a device accessing the internet), browser type and geographical location, (ii) we recognize your IP address when you re-visit the Website, (iii) we record the dates and duration of your visits, (iv) we know from which other website you are accessing the Website and to which other website you browse after, (v) we analyze which sites and features of the Website you are using.

For a full list of all Cookies currently used, the information they collect and their purposes please see the "List of Cookies".

Unless you actively contribute your name or other information on the Website which enables us to identify you, we will not be able, and we will not try to find out to whom the information collected through Cookies relate. Even if we have, or if you provide us with information, which enables us to identify you, we will not link the information collected through Cookies with information about your identity, except if we investigate into any unlawful acts or infringement of our rights and we have reason to believe that you are involved in such unlawful acts or infringement.

For more information about Cookies and how you can manage them using your browser or mobile device, please visit www.aboutcookies.org.

5. For what purposes do we process Personal Data?

(a) Information which you actively provide

When you actively provide Personal Data through the Website (e.g. in an online form) we are using such Personal Data for the purpose for which you provided it. By way of example: (1) If you were providing your e-mail in order to subscribe to a newsletter, we are using such Personal Data in order to send you such newsletter: (2) If you are providing your e-mail in order to request a catalogue, we are using such Personal Data in order to send you such catalogue: (3) if you are providing your name and email address to request assistance from the customer service team, we are using such Personal Data to aid your request.

In addition, we may use such Personal Data for statistical and analytical purposes (e.g. to find out how many people from which countries subscribe to our newsletters etc.). Whenever reasonably possible we will anonymize such information before using it for statistical or analytical purposes.

Additional purposes for processing your Personal Data may include in response to your request via an online form for a customer representative to contact you. We only process such Personal Data for additional purposes if we indicate such additional purpose at the section of the Website where you provide the Personal Data.

(b) Information collected automatically through Cookies:

We may process information collected through Cookies in order to analyze, understand and remember browsing activities, technical equipment, preferences, requirements, interests, needs and geographical location of users. We may use such information for the following purposes:

- to improve the use and features of the Website;
- to understand what services and products you are interested in;
- to adjust and develop products and services;
- to correct errors;
- to provide you with advertising and other information which better reflects your actual interests;
- to identify users, who commit unlawful acts or infringe our rights;

Whenever reasonably possible we will anonymize information before using it for such purposes.

6. Do we transfer Personal Data to third parties?

(a) Affiliates

Inflight Services Europe AB is part of an international group of companies where certain services are provided centralized by one or more affiliates for the entire group or a part of it. We, therefore, reserve the right to share Personal Data with our direct and indirect affiliates for all purposes described above in the section "For what purposes do we process Personal Data?". Whenever we share Personal Data with affiliates, we request from them that they commit themselves to process Personal Data in line with this Privacy & Cookies Policy only.

(b) Service providers

In addition, it may be necessary to share Personal Data with third parties who provide services to us for all purposes described above in the section "For what purposes do we process Personal Data?". Such service providers may include

- advertising and media consultants;
- market research consultants;
- providers of technical services;
- website designers and developers;
- cloud computing service providers;
- electronic storage providers;
- customer services;
- recruitment agencies;

Whenever we share Personal Data with such third parties we request that they process Personal Data provided by us only for our purposes and in accordance with our instructions and that they implement the technical and organizational measures to protect Personal Data against unauthorized access, loss, theft, alteration and use as appropriate considering the level of sensitivity of Personal Data being processed.

(c) Legal obligation or legitimate interests

In addition, we may always share Personal Data with third parties to the extent required by law or, to the extent permitted by applicable laws, necessary to pursue overriding legitimate interests. We may, by way of example, forward Personal Data to criminal prosecution authorities if necessary to investigate into illegal behavior, or we may use Personal Data in court or debt collection proceedings if necessary to enforce our rights.

(d) Google Analytics

We may share information with Google through the tool Google Analytics. In order to find out more about Google Analytics and what you can do if you do not agree that we forward information to Google please refer to the section "Additional Information about Google Analytics".

7. Do we make your Personal Data available outside the European Economic Area?

Some of the recipients of Personal Data (see the section "Do we transfer Personal Data to third parties?") are located outside of the European Economic Area, *i.e.* in jurisdictions where Personal Data is not protected by law to an equivalent level like in the European Economic Area. Before we make Personal Data available in such jurisdictions we do, however, make sure that such transfers are in compliance with data protection laws of the European Union. Unless the European Commission have decided that the country of the recipient provides adequate data protection legislation or the recipient is a subscriber to the EU/CH-US Privacy Shield, we always implement such contractual clauses as are recognized by the European Commission to provide adequate protection.

By accepting this Privacy & Cookies Policy, you are expressly authorizing us to process and share your Personal Data to the recipients of Personal Data (see the section "Do we transfer Personal Data to third parties?") located outside the European Economic Area for the purposes described herein (please see section "For what purposes do we process Personal Data?").

8. For how long do we store Personal Data?

We store Personal Data collected through the Website only insofar and as long as required to meet the purposes defined within this Privacy & Cookies Policy or to the extent required by law.

Unless the law requires longer storage of Personal Data, we will delete (or irreversibly anonymize) Personal Data 3 months after collection thereof at the latest.

9. Who are the Controller, Representative and Data Protection Officer?

The controller of Personal Data collected through the Website is Inflight Services Europe AB, Torshamnsgatan 20, 164 21 Kista, Sweden

For the European Economic Area, we appointed the following data protection representative and data protection officer:

Walder Wyss Ltd. Attention David Vasella, Seefeldstrasse 123 CH-8034 Zurich

10. How can you exercise your right to request information?

You have the right to submit an information request in order to learn what categories of Personal Data we are processing about you for what purposes, how we share your Personal Data with others and how long we store your Personal Data. If you would like to submit such request, please send an e-mail to gdpr@gategroup.com or a letter to Inflight Services Europe AB, Torshamnsgatan 20, 164 21 Kista, Sweden.

Your information request will be processed and answered without a fee, except if your requests are manifestly excessive (in particular because of their repetitive character) in which case we reserve the right to request prior payment of a fee of up to CHF 200 or to refuse to answer the request.

In rare cases we may – to the extent permitted by applicable law – have to partially or entirely refuse to answer your request. In such case we shall inform you about the reasons of such refusal. You are entitled to lodge a complaint with the supervisory authority (see below "Where can I lodge a complaint") against such refusal and seek a judicial remedy.

11. How can you exercise your rectification, erasure or opposition rights?

You have the right to request that we rectify incorrect Personal Data. In addition, you have the right to request that we delete your Personal Data or that we stop processing your Personal Data. If you wish to make such request, please send an e-mail to gdpr@gategroup.com or a letter to Inflight Services Europe AB, Torshamnsgatan 20, 164 21 Kista, Sweden.

Except where applicable data protection legislation does explicitly permit that we continue processing and/or keep your Personal Data, we shall forthwith delete and/or stop processing your Personal Data.

12. Where can you lodge a complaint?

You have the right to lodge a complaint about our processing of your Personal Data or about our response to an information, rectification or erasure request or to a request that we stop processing your Personal Data. If you wish to exercise such right, please refer to the

The Swedish Data Protection Authority Box 8114 104 20 Stockholm

For more information please see www.datainspektionen.se.

13. Links to other providers' websites

This Website may contain links to other providers' websites that are not covered by this Privacy & Cookies Policy but are subject to their own privacy policies.

14. Amendments of the Privacy & Cookies Policy

The right to amend this Privacy & Cookies Policy at any time is reserved. Amendments shall apply as soon as they are published on this Website.

15. Applicable law

This Privacy & Cookies Policy and its interpretation and any disputes arising under or in connection therewith are subject to the laws of Sweden, excluding the conflict of laws rules.

Inflight Services Europe AB

Additional Information about Cookies

What is a Cookie?

Cookies are small electronic files that are sent to your computer's hard drive by the web server on which the Website is hosted. Cookies pose no risk to your computer, as they are simply files and not executable programs.

What are Cookies used for on this Website?

We use so-called Session Cookies which are deleted when you end the browser session, as well as Permanent Cookies that are stored until deleted by you.

For the purposes for which Cookies may be used on the Website please see the section "For what purposes do we process Personal Data?"

For a complete list of the Cookies currently used on this Website, please see the up-to date <u>List of Cookies</u>.

Can the Cookie settings be changed?

You decide yourself whether the Website's web server is allowed to save Cookies on your computer or not. You can opt to change your browser settings so that Cookies are not allowed to be accepted or saved on your computer at any time. You can delete the files that are stored on your computer and that contain Cookies.

If you would like to know how you can disable Cookies of Google Analytics please click here.

Please be aware that declining or denying Cookies may prevent you from being able to use the Website to its highest capability and that some functions on the Website may be limited or unavailable.

List of Cookies

The below list shows the Cookies used by this Website, together with the purpose, duration and management of each Cookie.

User identification: User identification Cookies are used to identify and authenticate the user. User identification Cookies may also contain the technical data from the user's session such as, for example, waiting time for connection, session identifier, etc.

Session identification: Session identification Cookies are used to identify the http session of the user. Session identifier Cookies are common in all web applications to identify all user requests during a session.

Navigational status: Navigational status Cookies allow to identify the User's navigation status (start of the session, first page, first access, scroll status, etc.).

User selections: User selections Cookies store the session values chosen by the user, such as language, products, etc.

Favorites and last selections: Favorites and last selections Cookies allow the user's favorite and last selections to be remembered (such as cookies installation consent, etc.) in later web sessions.

Protocol: Protocol Cookies allow to process changes between secure (https) and non-secure (http) domains (protocol).

Origin: Origin Cookies are used to determine the origin of a user when arriving on a page on this Website, for example, whether the user has arrived from the search browser or from an external website.

Google Analytics: Google sets in particular the following Cookies:

utma Cookie: A persistent cookie that remains on a computer, unless it expires or the cookie cache
is cleared. It tracks visitors. Metrics associated with the Googleutma cookie include: first visit
(unique visit), last visit (returning visit). The cookie is updated every time data is sent to Google
Analytics.

__utmb Cookie: This cookie is used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.

__utmc Cookie: This cookie is used to determine the end of browser sessions. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.

__utmz Cookie: This cookie stores the traffic source or campaign that explains how the user reached the site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.

__utmv Cookie: This is a persistent cookie. It is used for segmentation, data experimentation and operates with the __utmz cookie to improve cookie targeting capabilities.

Please also see section "Additional Information about Google Analytics"

Does Inflight Services Europe AB use Google Analytics?

This Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google") in the US.

What is Google Analytics?

Google Analytics Cookies allow monitoring the Website by means of the Google Analytics tool, which is a service provided by Google to obtain user access information on the Website. Some of the data saved are: number of times a user visits the Website, dates of the first and last visit, duration of the visits, the page from where the user accessed the Website, the search engine the user used to access the Website or the link they clicked on, the place in the world from where the user accesses, etc.

The configuration of these Cookies is predetermined by the service offered by Google and the information generated by the Cookie about the use of the Website will be transmitted and stored by Google, Inc. (a United States-based company). Therefore, please consult the privacy page of Google Analytics, https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage, to obtain further information on the Cookies it uses.

Google will use this information for the purpose of evaluating the use of the Website, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google does not associate IP addresses with any other data held by Google.

Can Google Analytics Cookies be refused?

The use of Google Analytics Cookies may be refused by changing the appropriate browser settings.

Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under https://tools.google.com/dlpage/gaoptout?hl=en.