

## **INTRODUCTION**

Concierge U Ltd, t/a Jet Concierge Club Ltd (JCC) is registered in England and Wales with registration number 10781545 and registered offices at 54 Portland Place, London W1B 1DY.

JCC is committed to protecting our customer privacy and takes its responsibility regarding the security of customer information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as a customer;
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- And how we comply with the data protection rules.
- All personal data is collected and processed in accordance with EU data protection laws.

## **DATA CONTROLLER**

JCC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about our customers. We are required under GDPR to notify you of the information contained in this privacy policy.

## **WHAT PERSONAL INFORMATION DO WE HOLD**

Personal data is defined as any information relating to you which allows us to identify you, such as your name, contact details, payment details and information contained within travel documentation.

We may collect personal data from you when you enquire or enter into a contract with us (either directly or indirectly), when you contact us.

Specifically, we may collect the following information (where appropriate):

- a. Name, address, e-mail address, telephone number, passport or other recognized personal ID card numbers and details, payment details;
- b. Advance Passenger Information, which includes your name, nationality, date of birth, gender, passport or ID number, expiry date and country of issue;
- c. Medical conditions for passengers who have special medical requirements;
- d. Business history, including information related to your flights and services booked in connection with your flights;
- e. Information you provide about you and your companions' travel preferences; and

f. The communications you exchange with us or direct to us via emails, calls or letters.

Personal details about your physical or mental health is considered "sensitive" personal data under GDPR. We will process any such data only if you have given your explicit consent, or it is necessary (for instance if you request special assistance), or you have deliberately made it public.

## **WHAT DO WE USE YOUR INFORMATION FOR AND FOR HOW LONG**

Your data may be used for the following purposes:

- a. Immigration/customs control safety: we may be obliged to provide your information to border control agencies in multiple jurisdictions;
- b. Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements; or
- c. Contacting you in the event of a change or cancellation: these communications are not made for marketing purposes.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.

In most cases we will need to process your personal data, so we can enter into our contract with you.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation (e.g. Immigration or customs requirements);
- To protect your interests or those of another person (e.g. in case of a medical emergency);
- It is in our legitimate interests in operating our business (e.g. for administrative purposes).

Only children aged 16 or over can provide their own consent. For children under this age, consent of the children's' parents or legal guardians is required.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of personal data, the purposes for which we process it.

We also consider periods for which we might need to retain personal data to meet our legal obligations or to deal with queries and to protect our legal rights in the event of a claim being made.

When we no longer need your personal data, we will securely delete or destroy it. If we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

## **PERSONAL DATA SECURITY**

We have security procedures for the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage.

## **INTERNATIONAL DATA TRANSFER**

JCC may operate across multiple jurisdictions, (depending on your needs), some of which are not located in the European Economic Area (EEA).

Where this is necessary, we seek assurances from third parties to confirm their compliance with minimum EU regulation. Specifically, for the US, we ask for assurances they are maintaining standards under the "Privacy Shield Compliance".

## **SHARING YOUR PERSONAL DATA**

We may share your personal data with the following third parties for the purpose described in this Privacy Policy:

- a. Government authorities, law enforcement bodies, regulators and airports to which your flight may fly over for compliance with legal requirements;
- b. Trusted service providers such as FBO agents assisting our passengers at airports, cloud service and e-mail service providers; and
- c. Legal and other professional advisers, law courts and law enforcement bodies to enforce our legal rights in relation to our contract with you.

## **DATA PRIVACY MANAGER**

We have appointed a Data Privacy Manager ("DPM") to oversee compliance with this policy. You have the right to make a complaint at any time to a supervisory authority. You can contact them at [stephen.lawrinson@jetconcierge.co.uk](mailto:stephen.lawrinson@jetconcierge.co.uk).

## **YOUR DATA PROTECTION RIGHTS**

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what information and why we are holding/using it.
- **Request copies** of your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request deletion** of your personal information. This enables you to ask us to delete personal information where there is no good reason for us continuing to process it, or where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format.
- **Withdraw consent.** In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to exercise any of these rights, please contact our DPM via email [stephen.lawrinson@jetconciierge.co.uk](mailto:stephen.lawrinson@jetconciierge.co.uk) or by post at Concierge U Ltd, c/o Harrods Aviation, First Avenue, London Stansted Airport, CM24 1QQ.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **CHANGES TO OUR PRIVACY POLICY**

Our Privacy Policy may change from time to time and any changes to the statement will be communicated on our website.