

Privacy Policy

Effective Date: Nov 22nd 2018

OpenJet S.A. and its affiliates (collectively, the "Company", "we" or "us"), are committed to safeguarding the privacy and personal information of our customers and business partners. This Privacy Policy explains how we may collect, use, process, share, and store personal information about you, including through designated third-party service providers, and the choices that are available to you regarding this information.

In addition to information kept in hardcopy, this Privacy Policy also applies to our company websites, online applications that run on smart phones, tablets, mobile devices ("apps"), and other online services that we offer which link to this Privacy Policy. Our products and services may contain links to other websites; if you follow a link to any of these websites, you should read their own privacy policies.

Information you give us

We collect information about you when you open an account with us, purchase our products and services and/or remit payment for services. We also collect information about you using cookies, and if you interact with us via phone, website, or apps.

The types of information that you may give us vary depending on the specific entity with which you are doing business, and/or the particular services requested. The information you may give us could include categories such as, but not limited to, your name, work or personal address, e-mail address, phone number, date of birth, gender, financial and/or credit card information, passport or driving license information, national ID number, personal description and/or photograph, as well as customer data, payment data, employee data and/or website user data.

Information we receive from other sources

We may receive information about you if you use any of the other websites we operate or the other services we provide. We also work closely with third parties (including, for example, business partners, sub-contractors, payment and delivery services, and analytics providers) and may receive information about you from them.

How do we use the information about you?

We use your information to provide you with information, process orders for products and services that you request from us, and administer or otherwise carry out our obligations in relation to any agreement you have with us. We retain your information for the period necessary to serve a legitimate purpose or as required by law.

If at any time you wish us to stop using your information for any the above purposes, please contact us using the methods explained below. We will stop the use of your information for such purposes as soon as it is reasonably possible to do so.

How do we share your information?

We may share your personal information with selected third parties for the performance of any contract we enter into with them or you. These third parties will not use your personal information for any other purposes than what we have agreed to with them, and we request those third parties to implement adequate levels of protection in order to safeguard your personal information.

The data that we collect from you may be transferred to, and stored at, destinations inside and outside the European Economic Area ("EEA"). For example, it may be processed by our suppliers to provide you with

our services. While the information is under our control, we seek to ensure that your personal information receives the level of protection as required by the EEA, including seeking to ensure that it is kept secure and used only in accordance with our instructions and for legitimate purposes.

In the event we go through a business transition, such as a merger, acquisition of another company, or sale of part or all of our assets, we may disclose your personal information to third parties and your personal data held may be among one of the assets transferred.

We may also automatically collect non-personal information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to us. You cannot be identified from this information and it is only used to assist us in providing effective services.

Finally, we may be under a duty to disclose or share your personal information to comply with a legal obligation; to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This could include, for example, exchanging information with a law enforcement agency or regulator; or with companies and organizations for the purposes of fraud protection.

Use of Cookies

Our websites may use cookies to distinguish you from other users of our websites. This helps us to improve the functionality and content of the websites, including keeping our websites and records safe and secure, and to facilitate usage by you.

Rights under the GDPR

Under the EU General Data Protection Regulation ("GDPR"), if you are a citizen or resident of an EEA country or Switzerland, you may have certain rights regarding your personal information:

- Right to access information maintained about you;
- Right to ensure your data is accurate and complete;
- Right to erasure, or the right to be forgotten;
- Right to restriction or suppression of personal data;
- Right to data portability;
- Right to withdraw consent if consent was previously provided;
- Right to raise a complaint to the Information Commissioner's Office.

If you are eligible to invoke one of the rights listed above and wish to do so, you may contact us using the details found below. Please note that we may not always be able to fulfill your request as there may be legitimate purposes, such as certain legal or statutory obligations, that require us to retain your information as stored.

Updates and Amendments

As appropriate, we may make changes to this Privacy Notice that will be posted online and, where appropriate, be sent to you by e-mail. Please check back frequently to remain aware of any updates or changes to this Privacy Policy.

How to contact us

If you have additional questions, or believe you are eligible to submit a subject access request, you can reach us by email at privacy@openjet.com or by post at:

OpenJet S.A.

153-155 Rue du Kiem – L-8030 Strassen – Luxembourg