

# AirPlus International:

## Statement regarding commissioned Data Processing

To comply with the EU's General Data Protection Regulation (GDPR), AirPlus has had its role as a sole Data Controller externally assessed. This assessment confirmed the conclusion drawn by the Hessen Supervisory Authority, as documented in the 2000 Data Protection Report (published by the parliament of the state of Hesse, publication 15/1539, p. 20), stating that AirPlus indeed functions as a controller in relation to all data processed during invoicing activities.

According to applicable privacy laws, the entity that determines both the purposes and methods of personal data processing activities is accountable for such processing. In our case, AirPlus serves as a payment service provider, managing electronic payment transactions, authenticating them, and completing the associated processes. These activities align with the core purpose of our business, and we process data solely to fulfill these functions.

The data we handle includes personal information of customer employees, generated through their use of AirPlus products (such as credit card transactions) or provided directly by the customer or their representatives, such as Travel Agencies.

Moreover, AirPlus assumes full responsibility for processing descriptive billing information data. It's our duty to compile this data, generate invoices/statements, and send them to our contracting partners.

AirPlus functions as a sole controller rather than a processor concerning data processing activities. Therefore, AirPlus maintains its role as the primary data controller for processing personal travel data, as outlined in privacy legislations.

#### Data Controller

A data controller is the entity responsible for determining the purposes and methods of processing personal data.

### **Data Processor**

While a data processor is the entity that processes personal data on behalf of the data controller, following their instructions.

#### Joint Controller

In the context of European data protection law, joint controllership occurs where two or more entities jointly determine the purposes and means of processing personal data. However, in light of the payment security standards around the globe, AirPlus solely determines the purposes and means of any processing activity in the context of our payment solution services.