

# Data Protection & Privacy at AirPlus

## Introduction

AirPlus is a global provider of payment and billing solutions for business travel. We offer a variety of products & services related to corporate payment and expense management. Due to the nature of our business, we are subject to strict guidelines and regulations. This includes data protection and privacy regulations, such as the General Data Protection Regulation (GDPR), which impose stringent requirements on how personal data is handled and protected.

The objective of this document is to present the guiding principles governing the handling of personal data and the corresponding responsibilities within AirPlus International companies.

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## Core Privacy Compliance Principles

The General Data Protection Regulation (GDPR) defines principles for the lawful handling of personal information. Handling involves the organization, collection, storage, structuring, use, consultation, combination, communication, restriction, destruction, or erasure of personal data.

### **Fairness & Transparency**

AirPlus handles personal data with a commitment to fairness. Fairness entails that we do not engage in data processing methods that would harm or mislead the individuals involved.

### **Purpose Limitation**

Personal data is only be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

### **Data Minimization**

The "data minimization" principle at AirPlus dictates that we restrict the gathering of personal data to the specific and essential information required to achieve a designated purpose. Information is retained only for the necessary duration.

### **Accuracy**

AirPlus is obligated to ensure the accuracy of data, maintain it, and promptly rectify or delete any inaccurate information.

### **Storage Limitation**

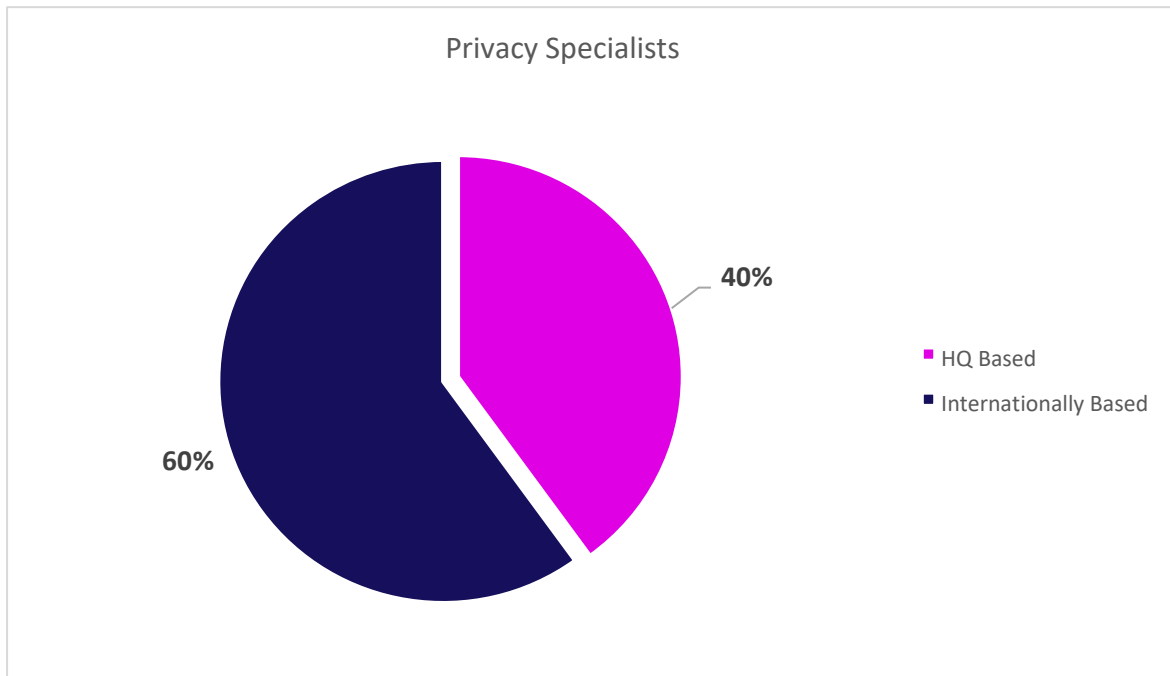
AirPlus does not keep any personal data for longer than it is needed.

## Legal Basis at AirPlus

Legal Basis pursuant to Article 6 GDPR	Legal Definition	Use case at AirPlus
<b>Article 6; s.1 (f) GDPR</b>	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.	<p>AirPlus and the Product Subscriber have a legitimate interest in processing Payment Data in order to deliver product functionality and expedite and facilitate travel expense management as well as procurement-processes. The type of payment data depends on the payment method/product used and subscribed to and could incl. data such as: Merchant, Usage Geolocation, Purchase Amounts, Purchase Category (e.g. travel, grocery, shopping) etc. Data is used to provide a detailed report to the payment method subscriber.</p> <p>Fraud prevention is the legitimate interest of AirPlus and our customers. We shall process certain data to prevent any kind of loss or fraud resulting from misuse or any fraudulent activity of one of our payment products.</p>
<b>Article 6; s.1 (c) GDPR</b>	Processing is necessary for compliance with a legal obligation to which the controller is subject;	Fraud prevention is not only the legitimate interest of AirPlus and our customers, but also a legal obligation. We shall process certain data to prevent any kind of loss or fraud resulting from misuse or any fraudulent activity of one of our payment products. This includes AML/CTF guidelines. Other legal obligations to process personal data may arise from tax and accounting requirements.
<b>Article 6; s.1 (a) GDPR</b>	The data subject has given consent to the processing of his or her personal data for one or more specific purposes;	AirPlus processes some of your data based on your consent. This processing includes, but is not limited to, dispatching AirPlus Group newsletters which offer information regarding AirPlus' services and products; news concerning the travel and payment services industries; invitations to participate in events, market research, or customer surveys; and invitations to participate in web seminars (hereinafter, "Webinars"). If you participate in any Webinars, your consent includes your agreement to the evaluation of your participation.

## Organizational Privacy Landscape

### Breakdown of the AirPlus Privacy Team



AirPlus is represented by branch offices and subsidiaries in various jurisdictions. The Headquarter is based in Neu-Isenburg, Germany. AirPlus' technical platforms, IT infrastructure as well as data centres are primarily located in the Headquarter. This is the reason why the vast majority of data processing and storage activities take place in Germany. Hence, nearly half of AirPlus' privacy staff are employed in the HQ while 60% are based in various jurisdiction.

## Global Privacy Teams

<b>Germany, France, Benelux &amp; Nordics, Israel, Malta, Portugal, South Africa, Spain, Hong Kong, India, Japan, Singapore, UAE</b>	Lufthansa AirPlus Servicekarten GmbH	Data Protection Officer, Privacy Experts & Local Data Protection Coordinator
<b>Americas</b>	AirPlus Intl. Inc.	Local Data Protection Coordinator
<b>Switzerland</b>	AirPlus Int. AG	Data Protection Officer

<b>China</b>	AirPlus Payment Management Co. Ltd.	Data Protection Officer
<b>United Kingdom</b>	AirPlus International Ltd.	Data Protection Officer
<b>Italy</b>	AirPlus International SRL	Data Protection Officer

The displayed table illustrates the preparedness of each AirPlus around the globe. It also highlights our office’s adherence to particularly stringent guidelines mandated by the data protection authorities.

### **DPO/DPC Responsibilities**

A Data Protection Officer (DPO) is a designated individual responsible for ensuring compliance with data protection laws. The appointment of a DPO in our case is mandated by law. They typically have legal expertise and serve as a point of contact for regulatory authorities. A Data Protection Coordinator (DPC) assists with compliance tasks but may not have the same legal responsibilities as a DPO. Understanding this difference is crucial for clarity in regulatory compliance and accountability.

### **Where does AirPlus process personal Data?**

AirPlus operates its own data center in Neu-Isenburg to host primary systems. Due to the nature of the business, transactions initiated abroad can always lead to foreign data processing on which AirPlus has little influence: i.e. payment made at Merchants through foreign Acquirer Services. However, no matter where your data is processed, the AirPlus Privacy Teams follow all local privacy guidelines to ensure your data is safe with us!

### **Is AirPlus a Data Processor?**

Data controllers determine how personal data is processed, while data processors handle data on their behalf. Banks and payment providers see themselves as controllers because they decide how customer data, like financial information, is used. This distinction is vital for legal compliance as the control over the “how” and “why” to process personal data is solely the independent decision of AirPlus.

## Other Privacy & Security Safeguarding measures

### Policies / Laws / Guidelines

PCI DSS Payment Card Industry Data Security Standard

Applicable payment service legislations

Local Financial Regulations

The Digital Operational Resilience Act (from 17<sup>th</sup> January 2025)

EU – AI Act (from 2025/2026 onwards)

## Where can I find support if I have any Data Protection related Queries?

For any inquiries, including those related to operational issues or challenges with data subject rights requests, please feel free to reach out to our privacy team at [dataprotection@airplus.com](mailto:dataprotection@airplus.com). We are here to assist you and address any questions you may have.

## Where can I find the AirPlus Privacy Statement?

Customer can find privacy statements [here](#), providing transparency about how their data is handled. Understanding these statements ensures informed consent and data protection compliance.