

AirPlus International

# Global Privacy Statement for AirPlus Products

Neu-Isenburg, 2024



**AirPlus**

Smarter payment. Better business.

## Table of Contents

1. How do we collect personal data? .....	4
2. Data Processing at AirPlus .....	4
2.1 AirPlus Product Descriptions .....	4
2.2 How does AirPlus use your personal data to provide our products & services? ....	5
2.3 Which personal data does AirPlus use to provide our products & services? .....	5
3. Payment Service Security .....	6
3.1 Fraud Prevention .....	6
3.2 Data processed to enable card payments (Corporate Card) .....	6
3.3 Credit Worthiness Check (Private Card) .....	6
4. Legal grounds for processing of your personal data .....	6
5. Data Transfers to Data Processors, Third Parties and Third Countries .....	7
5.1 Data Processors .....	7
5.2 Other Third Parties .....	7
5.3 Third Country Data Transfers .....	8
6. Your Rights .....	8
7. Data Retention .....	8
8. Contact us - Data Controller .....	9

# Global Product Privacy Statement

## About this Privacy Statement

AirPlus is your global partner whether you're in the market for business travel, procurement, or travel trade payment tools. When you pay with our payment solutions, you're trusting us with your information. Therefore, we understand the importance of protecting your privacy and safeguarding your personal information. This privacy statement outlines how we collect, use, and protect your personal data in compliance with applicable privacy laws.

We are committed to maintaining the confidentiality and security of your information while providing businesses with the best possible solutions.

## Scope of this Privacy Statement

**This privacy statement is valid for all jurisdictions where AirPlus Products & Services are offered.**

This statement uses the terms

**"AirPlus", "we", "us" or "our"**

referring to **AirPlus International GmbH** or its **affiliates** from which your personal data (i.e. personal information in some jurisdiction) has been collected. This legal entity serves as the designated data controller as defined by applicable privacy laws. To help you identify the correct legal entity we have provided a link in the section "Contact us".

AirPlus maintains separate data privacy statements for different types of data processing activities. This means, that this statement does not apply to:

- Data that AirPlus processes as data processor
- Direct marketing campaigns
- AirPlus colleagues, applicants & candidates
- Non-personal data (such as company information)
- Website

## 1. How do we collect personal data?

AirPlus collects personal data:

- **Directly from you**, through your relationship with us, such as when you provide data to us through your online or offline interactions
- **Indirectly from you**, through your use of our products, services, mobile applications, or software, in particular from our product subscribers and merchants
- **Others**, e.g. from credit score agencies

## 2. Data Processing at AirPlus

For all products (except the AirPlus Private Card) your employer (product subscriber) has entered into an agreement with AirPlus. AirPlus will provide the Subscriber with all the company's expenses through a collective statement displaying additional information relating to each transaction (see legal basis for processing personal data).

AirPlus may use your personal data for direct marketing purposes in accordance to the EU e-privacy directive, California Privacy Rights or other applicable electronic privacy guidelines.

### 2.1 AirPlus Product Descriptions

- **AirPlus Company Account**  
The AirPlus Company account is our central settlement solution for flights, hotels, rail tickets, car rentals, and other business travel expenses.
- **AirPlus Debit Account**  
The AirPlus Debit Account is a central settlement account, which is exempt from the credit card fees levied by many airlines and can be used to purchase tickets from these airlines.
- **AirPlus Meeting Card**  
The AirPlus Meeting Card is a dedicated central settlement solution for meetings and events.
- **AirPlus Travel Trade Account**  
The AirPlus Travel Trade Account is a centrally settled payment account for IATA and non-IATA travel agencies, as well as any other type of travel trader.
- **AirPlus Corporate Card**  
The Corporate Card can be used, like any other credit card, to pay for goods and services or withdraw cash.
- **AirPlus Corporate Card Type 3**  
The Corporate Card Type 3 contains a private liability for the card user.
- **AirPlus Virtual Cards Classic / Procurement / Travel Trade**  
The card user gets a 16-digit card number with a three-digit CVC code and expiry date that can be generated quickly, easily, and transparently while on the go through a provided software.

- **AirPlus Private Card**  
The AirPlus Private Card can be used like any other credit card to pay for personal expenses. Please do not use the Private Card for corporate/business expenditures.
- **AirPlus Intelligence**  
The AirPlus Intelligence is a modular analytics platform that can be used to analyze corporate spend.
- **AirPlus Merchant Agreement:**
  - a Merchant Agreement provides the contractual basis for acceptance partners to be able to accept AirPlus payment solutions including the Company Account for all products and services the merchant offers.

## 2.2 How does AirPlus use your personal data to provide our products & services?

We use your personal data to:

- Enable transactions (incl. authorization processes through payment networks).
- Facilitate the management of business travel related and procurement expenses.
- Be able to create a structured statement and share with the Subscriber.
- Collect Descriptive Billing Information to share with the Subscriber.
- Enable online account management.

Additionally, we may use your personal data to:

- Facilitate Corporate Discount Agreements with brokers between travel traders and airlines. AirPlus may transmit account data to the contracting partners on request of the Subscriber (central settlement accounts only).

## 2.3 Which personal data does AirPlus use to provide our products & services?

### Technical Information

- Credentials for online services
- Log data
- Rights & Roles Concept for the AirPlus Portal (e.g. Portal Administrator)

### Payment Information

- Payment method/network
- Date & time of payment
- Payment location
- Merchant category
- Purchased goods & services
- Payment amount
- Descriptive Billing Information (e.g. employee ID, cost center)

### Contract Data

- Bank & financial details (e.g. payment due date, account number)
- Master contract data
- Personal identification data

## 3. Payment Service Security

### 3.1 Fraud Prevention

To protect **you** and us from misuse & fraud, AirPlus uses automated data processing operations to determine fraudulent transactions ("Fraud Prevention"). Our experts who are supported by a software, use previous experience regarding fraudulent transactions as well as an analysis of your previous behavior. AirPlus Fraud Prevention uses a proven mathematical statistical model to check for fraudulent transactions.

Furthermore, AirPlus may process data for the purposes of fraud prevention

- Video identification of card users and parties to the Subscriber agreement (Incl. employees of the Subscriber)
- Confirmation & identifying financial beneficiaries
- Identification of signatories

### 3.2 Data processed to enable card payments (Private & Corporate Card)

Wherever you use a 16-digit card number for a payment, name, the card number, the expiry date, the CVC on the back of the card and your credit limit associated with the card is used to verify or decline a transaction.

### 3.3 Credit Worthiness Check (Private Card & Corporate Card Type 3)

When you apply for a Private Card, AirPlus uses your personal data to assess if you're likely to meet your payment obligations (Credit Worthiness Check). This involves using a mathematical-statistical model and gathering additional information from third parties like credit agencies or banks. Depending on this information, our experts evaluate if your application may be accepted or rejected, and your credit limit set. This process also helps manage risk at AirPlus. If you have questions about this or your credit limit, please reach out to our customer support.

## 4. Legal grounds for processing of your personal data

Data Processing Activity	Legal Basis	Legal Basis - Description
Fraud Prevention	Legitimate Interest	AirPlus has a legitimate interest to prevent fraudulent use of credit cards and to prevent Card User losses.
Anti-Money-Laundering and Terror Prevention	Legal Obligation	Anti-Money-Laundering and Terror Prevention is conducted pursuant to the legal obligations and in compliance with payment industry guidelines.
Data transfers to public authorities, when legally required	Legal Obligation	We will transfer personal data to public authorities, such as financial regulators, police, prosecutors, courts wherever required to do so by law.
The Credit Worthiness Check and the credit limit assignment  (Private Card & Corporate Card 3 only)	Legitimate Interest	AirPlus uses your personal data to assess if you're likely to meet your payment obligations (Credit Worthiness Check).
Call Recording (Corporate Card Customer Service)	Consent	During the use of the AirPlus Corporate Card Customer Service Center, AirPlus may collect and process personal data necessary to evaluate the received service quality and experience given by the facilitator for future service improvements and Service Agent training purposes.
Data Transfer to Product Subscriber (your employer)	Legitimate Interest	AirPlus and the Subscriber have a legitimate interest in processing Corporate Card Data in order to deliver product functionality and expedite and facilitate travel expense management as well as procurement.
Business Partner Due Diligence	Legal Obligation & Legitimate Interest	AirPlus processes the personal data it collects to conclude and manage contracts with its business partners, to carry out pre-contractual measures upon request, and to comply with its legal obligations both domestically and internationally.

## 5. Data Transfers to Data Processors, Third Parties and Third Countries

AirPlus will forward your personal data only to fulfil the respective business purpose, if mandated by law, or to service providers which have been contracted by AirPlus and are obligated to comply with applicable data protection regulations.

### 5.1 Data Processors

AirPlus provides access to or shares your personal data with carefully selected service providers. These service providers only handle your product data on behalf of AirPlus as so called data processors, acting only on instructions given by AirPlus. Our service providers are contractually obligated to follow those instructions. Therefore they are prohibited from using your personal data for their own business purposes. AirPlus shares your personal data under strict confidentiality obligations with the following categories of service providers:

- IT service provider (hosting and infrastructure services),
- Transaction-related service providers (receipt processing services), located in Europe
- Customer relationship service providers (call center services), located In Europe

### 5.2 Other Third Parties

To facilitate payments, transaction data is exchanged among various parties involved: the merchant, the merchant's acquirer (often a bank), credit card networks (like VISA, UATP or Mastercard), and the card issuer (like AirPlus). This information is solely used for payment authorization and processing. AirPlus may share your data with trusted third parties to assist in payment services, ensuring data confidentiality and compliance with regulations.

Additionally, AirPlus may share your data with auditors, insurance companies, lawyers, and public authorities as required by law or for legitimate business interests, such as audits, insurance claims, legal proceedings or regulatory compliance.

### 5.3 Third Country Data Transfers

Personal Data will be transferred to countries outside of the jurisdictions of your local AirPlus Entity, our subsidiaries and to countries outside of the European Union or the European Economic Area ("third countries") only to the extent required for the respective purpose (e.g. enabling transactions or reports to Subscribers) or mandated by law (e.g. reporting duties stipulated by tax laws). Prior to any transfer of Account Data to processors or third parties in third countries, AirPlus ensures that a transfer mechanism pursuant to applicable privacy laws is in place (e.g. the Model Clauses for the transfer of personal data to third countries provided by the European Commission). In order to receive a copy of the safeguards in place for your specific jurisdiction please use the contact details provided at the end of this Privacy Statement.



## 6. Your Rights

**Depending on your location and local laws**, you may have privacy rights regarding AirPlus's handling of your personal data. These rights include:

**Access:** Ask if we're processing your data and access it by requesting a copy of your personal data.

**Rectification:** Obtain a rectification of inaccurate data from us. This includes incomplete data.

**Erasure:** Ask for your data to be deleted, except legal retention periods apply (see below)

**Opt-Out:** Choose not to have your data used for targeted advertising.

**Portability:** Request a copy of your data in a portable and a standard machine-readable format wherever feasible.

**Restriction:** Request limits on how we use your data, except when legally required or for legitimate reasons.

**Object:** Object to specific types of data processing.

**Consent Withdrawal:** Withdraw your consent for data processing.

**Avoid Automated Decisions:** Not be solely subject to automated decisions.

**Lodge Complaints:** Lodge complaints with supervisory authorities if you believe your data subject rights are violated. You can find local Data Protection Authorities in Europe here.

[European Data Protection Board \(europa.eu\)](https://europa.eu)

For more information, contact us as outlined in the end of the document.

## 7. Data Retention

AirPlus processes and saves personal data only to the extent required to fulfill the purpose for which it was collected. Exceptions apply if AirPlus has a legal obligation to retain that data (e.g. for trade or tax law requirements).

AirPlus will erase your personal data as soon as it is no longer needed for the aforementioned purposes. Personal data may also be saved for the period of time in which claims can be asserted against AirPlus.

Additionally personal data will be saved to the extent to which and for those periods of time for which AirPlus is legally required to do so. Our obligations regarding proof and retention are stipulated by local laws, including but not limited to civil litigation.

## 8. Contact us - Data Controller

The Data Controller is AirPlus. You can reach out directly to our privacy team and our DPOs through our global privacy help center: [dataprotection@airplus.com](mailto:dataprotection@airplus.com)

To identify the precise local legal entity of AirPlus for your jurisdiction, simply click here.

## 9. Chinese Supplementary Privacy Notice

The following description of data processing activities of AirPlus Payment Management Co Ltd (“AirPlus China”) supplements the Global Privacy Statement for AirPlus Products. In case of any inconsistencies between this supplement and the Privacy Statement, the supplement shall prevail.