

# Privacy Notice of JetFlo S.A

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## Type of personal data

### General Data

We process general personal data about you.

### Financial Data

We process your financial data.

### Health Data

We process your health data.

### Biometric Data

We process your biometric data.

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## Source of personal data

### Provided Data

We process personal data that you provide to us.

### Collected Data

We process personal data that we collect about you.

### Received Data

We process personal data about you that we receive from third parties.

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## Purpose of processing

### Marketing

We use your personal data for marketing and advertising.

### Product Development

We use your personal data for the development and improvement of products and services.

### Other Purposes

We use your personal data for other purposes without direct connection with the core service.

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## Special processes

### Profiling

We analyse your behaviour and make assumptions about your interests and preferences

## Passing on to third parties

### Data Transfers

We transfer your personal data to other companies that decide themselves how to use the data.

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## Place of processing

### Switzerland and EEA

We only process your personal data in Switzerland and in the EEA.

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## 1. What is this Privacy Notice about?

JetFlo (also «we», «us») collects and processes personal data that concern you but also other individuals («third parties»). We use the word «data» here interchangeably with «personal data».

In this Privacy Notice, we describe what we do with your data when you use [www.jetflo.com](http://www.jetflo.com) or our app (collectively «website»), obtain services or products from us, interact with us in relation to a contract, communicate with us or otherwise deal with us. When appropriate we will provide a just-in-time notice to cover any additional processing activities not mentioned in this Privacy Notice. In addition, we may inform you about the processing of your data separately, for example in consent forms, terms and conditions, additional privacy notices, forms and other notices.

If you disclose data to us or share data with us about other individuals, such as family members, co-workers, other passengers etc., we assume that you are authorized to do so and that the relevant data is accurate. When you share data about others with us, you confirm that. Please make sure that these individuals have been informed about this Privacy Notice.

This Privacy Notice is aligned with the EU General Data Protection Regulation («**GDPR**»), the Swiss Data Protection Act («**DPA**») and the revised Swiss Data Protection («**revDPA**»). However, the application of these laws depends on each individual case.

## 2. Who is the controller for processing your data?

Unless otherwise stated in a separate document, JetFlo S.A, whose registered office is at Chemin des Papillons 4, 1216 Cointrin, GE, Switzerland («**JetFlo**») is the controller for the data processing under this Privacy Notice.

You may contact us for data protection concerns and to exercise your rights under Section 11 as follows:

**Jetflo SA**  
**Chemin des Papillons 4**  
**CH-1216 Cointrin**  
[dataprotection@jetflo.com](mailto:dataprotection@jetflo.com)

## 3. What data do we process?

We process various categories of data about you. The main categories of data are the following:

- **Technical data:** When you use our website, we collect the IP address of your terminal device and other technical data in order to ensure the functionality and security of these offerings. This data includes logs with records of the use of our systems. We generally keep technical data for **6** months. In order to ensure the functionality of these offerings, we may also assign an individual code to you or your terminal device (for example as a cookie, see Section 12). Technical data as such does not permit us to draw conclusions about your identity. However, it may be linked with other categories of data (and potentially with your person) in relation to user accounts, registrations, access controls or the performance of a contract.
- **Registration data:** Certain services (such as login areas of our website, newsletters, etc.) can only be used with a user account or registration, which can happen directly with us or through our third-party login service providers. In this regard you must provide us with certain data, and we collect data about the use of the service. Registration data may be required in relation to access control to certain facilities, potentially including biometric data, depending on the control system. We generally keep registration data for 12 months from the date the use of the service ceases or the user account is closed.
- **Communication data:** When you are in contact with us via the contact form, by e-mail, WhatsApp, telephone or chat, or by letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the metadata of the communication.

- **Master data:** With master data we mean the basic data that we need, in addition to contract data (see below), for the performance of our contractual and other business relationships or for marketing and promotional purposes, such as name and contact details, and information about, for example, your role and function, your bank details or credit card information, your date of birth. We process your master data if you are a customer or other business contact or work for one (for example as a contact person of the business partner), or because we wish to address you for our own purposes or for the purposes of a contractual partner (for example as part of marketing and advertising, with invitations to events, with newsletters, etc.). We receive master data from you, from parties you work for, or from third parties such as contractual partners, associations and address brokers, and from public sources such as public registers or the internet (websites, social media, etc.). We may also process health data and information about third parties as part of master data. We generally keep master data for 10 years from the last exchange between us or from the end of the contract. This period may be longer if required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. For contacts used only for marketing and advertising, the retention period is usually much shorter, usually no more than 2 years from the last contact.
- **Contract data:** This means data that is collected in relation to the conclusion or performance of the contracted services, for example information about the contracts and the services provided or to be provided, as well as data from the period leading up to the conclusion of a contract, information required or used for performing a contract, and information about feedback (for example complaints, feedback about satisfaction, etc.). This includes health data and information about third parties, for example vaccinations. We generally collect this data from you, from contractual partners and from third parties involved in the performance of the contract, but also from third-party sources (for example credit information providers) and from public sources. We generally keep this data for 10 years from the last contract activity or from the end of the contract. This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.
- **Behavioral and preference data:** Depending on our relationship with you, we try to get to know you better and to tailor our products, services and offers to you. For this purpose, we collect and process data about your behavior and preferences. We do so by evaluating information about your behavior in our domain, and we may also supplement this information with third-party information, including from public sources. Based on this data, we can for example determine the likelihood that you will use certain services or behave in a certain way. The data processed for this purpose is already known to us (for example where and when you use our services), or we collect it by recording your behavior. We anonymize or delete this data when it is no longer relevant for the purposes pursued, which may be – depending on the nature of the data – between 3 weeks and 24 months (for product and service preferences). This period may be longer where necessary for evidentiary purposes, to

comply with legal or contractual requirements, or for technical reasons. We describe how tracking works on our website in Section 12.

- **Other data:** We also collect data from you in other situations. For example, data that may relate to you (such as files, evidence, etc.) is processed in relation to administrative or judicial proceedings. We may also collect data for health protection (for example as part of health protection protocols). The retention period for this data depends on the processing purpose and is limited to what is necessary. This ranges from a few days for many security cameras, to a few weeks for contact tracing and visitor data, which is usually kept for 3 months, to several years or more for reports about events with images.

Much of the data set out in this Section 3 is provided to us by you. You are not obliged or required to disclose data to us except in certain cases such travel authorization data required by customs. If you wish to enter into contracts with us or use our services, you must also provide us with certain data, in particular master data, contract data and registration data, as part of your contractual obligation under the relevant contract. When using our website, the processing of technical data cannot be avoided. If you wish to gain access to certain systems, you must also provide us with registration data. However, in the case of behavioral and preference data, you generally have the option of objecting or not giving consent.

As far as it is not unlawful, we also collect data from public sources (for example debt collection registers, commercial registers, the media, or the internet including social media) or receive data from public authorities and from other third parties (such as travel agencies, sanctions agencies, credit agencies, address brokers, associations, contractual partners, internet analytics services, etc.).

#### **4. For what purposes do we process your data?**

We process your data for the purposes explained below. Further information is set out in Sections 12 and 13 for online services. These purposes and their objectives represent interests of us and potentially of third parties. You can find further information on the legal basis of our processing in Section 5.

We process your data for purposes related to communication with you, in particular in relation to responding to inquiries and the exercise of your rights (Section 11) and to enable us to contact you in case of queries. For this purpose, we use in particular communication data and master data, and registration data in relation to services that you use. We keep this data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries.

We process data for the conclusion, administration and performance of contractual relationships.

We process data for marketing purposes and relationship management, for example to send our customers and other contractual partners personalized advertising for products

and services from us and from third parties. This may happen in the form of newsletters and other regular contacts (electronically, by e-mail or by telephone), through other channels for which we have contact information from you, but also as part of marketing campaigns (for example events, contests, etc.) and may also include free services (for example invitations, etc.). You can object to such contacts at any time (see at the end of this Section 4) or refuse or withdraw consent to be contacted for marketing purposes. With your consent, we can target our online advertising on the internet more specifically to you (see Section 12).

We further process your data for market research, to improve our services and operations, and for product development.

We may also process your data for security and access control purposes.

We process personal data to comply with laws, directives and recommendations from authorities and internal regulations («Compliance»).

We also process data for the purposes of our risk management and as part of our corporate governance, including business organization and development.

We may process your data for further purposes, for example as part of our internal processes and administration or for quality assurance purposes and trainings.

## **5. On what basis do we process your data?**

Where we ask for your **consent** for certain processing activities (for example for the processing of sensitive personal data, for marketing mailings, for personalized motion profiles and for advertising management and behavior analysis on the website), we will inform you separately about the relevant processing purposes. You may withdraw your consent at any time with effect for the future by providing us written notice (by mail) or, unless otherwise noted or agreed, by sending an e-mail to us; see our contact details in Section 2.. Where you have a user account, you may also withdraw consent or contact us also through the relevant website or other service, as applicable. Once we have received notification of withdrawal of consent, we will no longer process your information for the purpose(s) you consented to, unless we have another legal basis to do so. Withdrawal of consent does not, however, affect the lawfulness of the processing based on the consent prior to withdrawal.

Where we do not ask for consent for processing, the processing of your personal data relies on the requirement of the processing for initiating or performing a contract with you (or the entity you represent) or on our or a third-party legitimate interest in the particular processing, in particular in pursuing the purposes and objectives set out in Section 4 and in implementing related measures. Our legitimate interests also include compliance with legal regulations, insofar as this is not already recognized as a legal basis by applicable data protection law (for example in the case of the GDPR, the laws in the EEA and in the case of the DPA, Swiss law). This also includes the marketing of our products and services, the interest in better understanding our markets and in managing and further developing our company, including its operations, safely and efficiently.

Where we receive sensitive personal data (for example health data, data about political opinions, religious or philosophical beliefs, and biometric data for identification purposes), we may process your data on other legal basis, for example, in the event of a dispute, as required in relation to a potential litigation or for the enforcement or defense of legal claims. In some cases, other legal basis may apply, which we will communicate to you separately as necessary.

## 6. What applies in case of profiling and automated individual decisions?

We may automatically evaluate personal aspects relating to you («profiling») based on your data (Section 3) for the purposes set out in Section 4, where we wish to determine preference data, but also in order to detect misuse and security risks, to perform statistical analysis or for operational planning. We may also create profiles for these purposes, i.e. we may combine behavioral and preference data, but also master data, contract data and technical data relating to you in order to better understand you as a person with your various interests and other characteristics.

In both cases, we pay attention to the proportionality and reliability of the results and take measures against misuse of these profiles or profiling. Where these can produce legal effects concerning you or similarly significantly affect you, we generally ensure human review.

## 7. With whom do we share your data?

In relation to our contracts, the website, our services and products, our legal obligations or otherwise with protecting our legitimate interests and the other purposes set out in Section 4, we may disclose your personal data to third parties, in particular to the following categories of recipients:

- **Service providers:** We work with service providers in Switzerland and abroad who process your data on our behalf or as joint controllers with us or who receive data about you from us as separate controllers (for example IT providers, shipping companies, advertising service providers, login service providers, cleaning companies, security companies, banks, insurance companies, debt collection companies, credit information agencies, or address verification providers). This may include health data. For the service providers used for the website, see Section 12. Key service providers in the IT area are Microsoft and **Salesforce**,
- **Contractual partners including customers:** This refers to customers and our other contractual partners as this data disclosure results from these contracts. If you work for one of these contractual partners, we may also disclose data about you to that partner in this regard.
- **Authorities:** We may disclose personal data to agencies, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to make such disclosures or if it appears necessary to protect our interests. This may include health data. These authorities act as separate controllers.

- **Other persons:** This means other cases where interactions with third parties follows from the purposes set out in Section 4, for example service recipients or if you are included in one of our publications.

All these categories of recipients may involve third parties, so that your data may also be disclosed to them. We can restrict the processing by certain third parties (for example IT providers), but not by others (for example authorities, banks, etc.).

We reserve the right to make such disclosures even of secret data (unless we have expressly agreed with you that we will not disclose such data to certain third parties, except if we are required to do so by law). Notwithstanding the foregoing, your data will continue to be subject to adequate data protection in Switzerland and the rest of Europe, even after disclosure. For disclosure to other countries, the provisions of Section 8 apply. If you do not wish certain data to be disclosed, please let us know so that we can review if and to what extent we can accommodate your concern (Section 2).

## **8. Is your personal data disclosed abroad?**

As detailed in section 7, we may disclose data to third parties in certain cases. Your data may therefore be processed both in Europe and worldwide depending on your destination.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data, unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on an exception. An exception may apply for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing.

## **9. How long do we process your data?**

We process your data for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence require it or storage is a technical requirement. You will find further information on the respective storage and processing periods for the individual data categories in Section 3, and for cookies in Section 12. If there are no contrary legal or contractual obligations, we will delete or anonymize your data once the storage or processing period has expired as part of our usual processes.

## **10. How do we protect your data?**

We take appropriate security measures in order to maintain the required security of your personal data and ensure its confidentiality, integrity and availability, and to protect it against unauthorized or unlawful processing, and to mitigate the risk of loss, accidental alteration, unauthorized disclosure or access.



## 11. What are your rights?

**Applicable data protection laws grant you the right to object to the processing of your data in some circumstances, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing.**

To help you control the processing of your personal data, you have the following rights in relation to our data processing, depending on the applicable data protection law:

- The right to request information from us as to whether and what data we process from you;
- The right to have us correct data if it is inaccurate;
- The right to request erasure of data;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- The right to withdraw consent, where our processing is based on your consent;
- The right to receive, upon request, further information that is helpful for the exercise of these rights;

**If you wish to exercise the above-mentioned rights in relation to us**, please contact us by e-mail; you will find our contact details in Section 2. In order for us to be able to prevent misuse, we need to identify you (for example by means of a copy of your ID card, unless identification is not possible otherwise).

You also have these rights in relation to other parties that cooperate with us as separate controllers – please contact them directly if you wish to exercise your rights in relation to their processing. You will find information on our key partners and service providers in Section 7 and additional information in Section 12.

Please note that conditions, exceptions or restrictions apply to these rights under applicable data protection law (for example to protect third parties or trade secrets). We will inform you accordingly where applicable.

If you do not agree with the way we handle your rights or with our data protection practices, please let us know. If you are located in the EEA, the United Kingdom or in Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country. You can find a list of authorities in the EEA here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en). You can reach the UK supervisory authority here: <https://ico.org.uk/global/contact-us/>. You can reach the Swiss supervisory authority here: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>.

## 12. Do we use online tracking and online advertising techniques?

We use various techniques on our website that allow us and third parties engaged by us to recognize you during your use of our website, and possibly to track you across several visits. This Section informs you about this.

In essence, we wish to distinguish access by you (through your system) from access by other users, so that we can ensure the functionality of the website and carry out analysis and personalization. We do not intend to determine your identity, even if that is possible where we or third parties engaged by us can identify you by combination with registration data. However, even without registration data, the technologies we use are designed in such a way that you are recognized as an individual visitor each time you access the website, for example by our server (or third-party servers ) that assign a specific identification number to you or your browser (so-called «cookie»).

We use these technologies on our website and may allow certain third parties to do so as well. You can also set your browser to block or deceive certain types of cookies or alternative technologies, or to delete existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on the help pages of your browser (usually with the keyword «Privacy») or on the websites of the third parties set out below.

We distinguish the following categories of «cookies» (including other technologies such as fingerprinting):

- **Necessary cookies:** Some cookies are necessary for the functioning of the website or for certain features. For example, they ensure that you can move between pages without losing information that was entered in a form. They also ensure that you stay logged in. These cookies exist temporarily only («session cookies»). If you block them, the website may not work properly. Other cookies are necessary for the server to store options or information (which you have entered) beyond a session (i.e. a visit to the website) if you use this function (for example language settings, consents, automatic login functionality, etc.). These cookies have an expiration date of up to **24** months.
- **Performance cookies:** In order to optimize our website and related offers and to better adapt them to the needs of the users, we use cookies to record and analyze the use of our website, potentially beyond one session. We use the third-party analytics services listed below for this purpose. Before we use such cookies, we ask for your consent which you can withdraw at any time through the cookie settings here. Performance cookies also have an expiration date of up to 24 months. Details can be found on the websites of the third-party providers.
- **Marketing Cookies:** We and our advertising partners have an interest in targeting advertising as precisely as possible, i.e. only showing it to those we wish to address. We have listed our advertising partners below. For this purpose, we and our advertising partners – if you consent – use cookies that can record the content that has been accessed or the contracts that have been concluded. This allows us and our advertising partners to display advertisements that we think will interest you on our

website, but also on other websites that display advertisements from us or our advertising partners. These cookies have an expiration period of a few days to 12 months, depending on the circumstances. If you consent to the use of these cookies, you will be shown related advertisements. If you do not consent to them, you will not see less advertisements, but simply any other advertisement.

In addition to marketing cookies, we use other technologies to control online advertising on other websites and thereby reduce advertising wastage. For example, we may transmit the e-mail addresses of our users, customers and other persons to whom we wish to display advertisements to operators of advertising platforms (for example social media). If these persons are registered with them with the same e-mail address (which the advertising platforms determine by a matching process), the providers display our advertisements specifically to these persons. The providers do not receive personal e-mail addresses of persons who are not already known to them. In case of known e-mail addresses, however, they learn that these persons are in contact with us and the content they have accessed.

We currently use offers from the following service providers (where they use data from you or cookies set on your computer for advertising purposes):

- **Google Analytics:** Google Ireland Ltd. (located in Ireland) is the provider of the service «Google Analytics» and acts as our processor. Google Ireland relies on Google LLC (located in the United States) as its sub-processor (both «Google»). Google collects information about the behavior of visitors to our website (duration, page views, geographic region of access, etc.) through performance cookies (see above) and on this basis creates reports for us about the use of our website. We have configured the service so that the IP addresses of visitors are truncated by Google in Europe before forwarding them to the United States and then cannot be traced back. We have turned off the «Data sharing» option and the «Signals option». Although we can assume that the information we share with Google is not personal data for Google, it may be possible that Google may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data with the Google accounts of these individuals for its own purposes. In any event, if you consent to the use of Google Analytics, you expressly consent to any such processing, including the transfer of your personal data (in particular website and app usage, device information and unique IDs) to the United States and other countries. Information about data protection with Google Analytics can be found here [<https://support.google.com/analytics/answer/6004245>] and if you have a Google account, you can find more details about Google's processing here [<https://policies.google.com/technologies/partner-sites?hl=en>].

### **13. What data do we process on our social network pages?**

We may operate pages and other online presences on social networks and other platforms operated by third parties and collect the data about you described in Section 3 and below. We receive this data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). At the same time, the platforms analyze your use of our online

presences and combine this data with other data they have about you (for example about your behavior and preferences). They also process this data for their own purposes, in particular for marketing and market research purposes (for example to personalize advertising) and to manage their platforms (for example what content they show you) and, to that end, they act as separate controllers.

We process this data for the purposes set out in Section 4, in particular for communication, for marketing purposes (including advertising on these platforms, see Section 12) and for market research. You will find information about the applicable legal basis in Section 5. We may disseminate content published by you (for example comments on an announcement), for example as part of our advertising on the platform or elsewhere. We or the operators of the platforms may also delete or restrict content from or about you in accordance with their terms of use (for example inappropriate comments).

For further information on the processing of the platform operators, please refer to the privacy information of the relevant platforms. There you can also find out about the countries where they process your data, your rights of access and erasure of data and other data subjects rights and how you can exercise them or obtain further information. We currently use the following platforms:

- **Facebook:** On Facebook we operate the page [www.facebook.com/jetflosa](http://www.facebook.com/jetflosa). The controller for the operation of the platform for users from Europe is Facebook Ireland Ltd., Dublin, Ireland. Their privacy notice is available at [www.facebook.com/policy](http://www.facebook.com/policy). Some of your data will be transferred to the United States. You can object to advertising here: [www.facebook.com/settings?tab=ads](http://www.facebook.com/settings?tab=ads). With regard to the data collected and processed when visiting our site for «page insights», we are joint controllers with Facebook Ireland Ltd., Dublin, Ireland. As part of page insights, statistics are created about the actions visitors perform on our site (comment on posts, share content, etc.). This is explained at [www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](http://www.facebook.com/legal/terms/information_about_page_insights_data). It helps us understand how our page is used and how to improve it. We receive only anonymous, aggregated data. We have agreed our data protection responsibilities according to the information on [www.facebook.com/legal/terms/page\\_controller\\_addendum](http://www.facebook.com/legal/terms/page_controller_addendum).

#### **14. Can we update this Privacy Notice?**

This Privacy Notice is not part of a contract with you. We can change this Privacy Notice at any time. The version published on this website is the current version.

Last updated: **December 2022**