



PRIVACY POLICY

Schiphol Travel b.v.

Schiphol Travel Privacy Policy

1. Introduction

Schiphol Travel B.V. ("Schiphol Travel," "we," "us," or "our") is committed to protecting the privacy and security of your personal information. This Privacy Policy outlines our practices concerning the collection, use, and protection of personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

This policy applies to all services provided by Schiphol Travel, including our corporate travel organization services and the Schiphol Travel International app.

2. Definitions

- **Client:** Any legal entity or individual conducting business activities that engages Schiphol Travel to provide travel-related services.

- **Traveler:** An individual receiving one or more services as per the agreement established with the client. In the context of data protection regulations, a traveler is considered a data subject.

3. Data Controller Status

Schiphol Travel operates as an autonomous data controller as defined by the GDPR. This designation was conferred by the Data Protection Group of the European Commission in 2010 (Advisory Opinion 1/2010, Example 7).

4. Personal Data We Process

4.1 Types of Personal Data

We process the following categories of personal data:

- Identification information (e.g., full name, gender, date of birth)
- Contact details (e.g., residential address, phone number, email)
- Travel document information (e.g., passport or ID details, nationality)
- Professional information (e.g., employer details, position, department)
- Travel preferences and history
- Payment details
- Login credentials for online tools
- Precise location data (for mobile app users)

4.2 Purpose of Processing

We process personal data for the following purposes:

- Providing and managing travel-related services
- Ensuring compliance with travel policies
- Facilitating bookings and reservations
- Managing client accounts and relationships
- Enhancing user experience and service quality
- Ensuring traveler safety and security
- Complying with legal and regulatory obligations

4.3 Legal Basis for Processing

We process personal data based on one or more of the following legal grounds:

- Performance of a contract
- Compliance with legal obligations
- Legitimate interests of Schiphol Travel or our clients
- Consent of the data subject

For each type of data processing, we ensure that at least one of these legal bases applies. Where we rely on legitimate interests, we perform a balancing test to ensure that our interests do not override the fundamental rights and freedoms of data subjects.

4.4 Data Minimization and Accuracy

We collect and process only the personal data that is necessary for the specified purposes. We take reasonable steps to ensure that the personal data we process is accurate and kept up to date. You can request corrections to your data at any time.

5. Location Data Collection and Use

5.1 Collection of Location Data

The Schiphol Travel International app collects precise location data to provide real-time risk alerts and personalized assistance notifications. This data may be collected even when the app is closed or not in use, subject to device settings and user permissions.

5.2 Use of Location Data

Location data is used to:

- Provide real-time risk alerts relevant to the traveler's current location
- Offer personalized assistance notifications based on the traveler's whereabouts
- Enhance travel safety and security features
- Improve emergency response capabilities

Users can disable background location tracking through their device settings, although this may limit certain app functionalities.

6. Data Retention and Deletion

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulations. Specific retention periods are as follows:

- Travel booking data: 7 years after the last travel date
- Payment information: 7 years for tax purposes
- Marketing communications preferences: Until you opt-out or request deletion

After the retention period, personal data is securely deleted or anonymized.

7. Data Security Measures

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- Encryption of personal data
- Regular testing and evaluation of security measures
- Access controls and authentication procedures
- Employee training on data protection and confidentiality
- Incident response and business continuity plans

8. Data Subject Rights

Under the GDPR, data subjects have the following rights:

- Right to access
- Right to rectification
- Right to erasure ('right to be forgotten')
- Right to restrict processing
- Right to data portability
- Right to object to processing
- Rights related to automated decision-making and profiling

To exercise these rights, please contact our Data Protection Officer at gdpr@schipholtravel.com. We will respond to your request within one month of receipt.

9. Consent and Special Categories of Data

Where we process special categories of personal data (such as health information for travel insurance), we will obtain your explicit consent unless another legal basis applies. You have the right to withdraw your consent at any time.

10. Children's Data

We do not knowingly collect or process data relating to children under the age of 16. If we become aware that we have collected personal data from a child under 16 without parental consent, we will take steps to delete such information.

11. Automated Decision-Making and Profiling

Schiphol Travel does not engage in automated decision-making or profiling that produces legal or similarly significant effects on data subjects.

12. Data Protection Officer

Schiphol Travel has appointed a Data Protection Officer (DPO) to oversee our data protection strategy and ensure compliance with data protection laws. You can contact our DPO at gdpr@schipholtravel.com.

13. Accountability and Data Protection by Design

We implement appropriate technical and organizational measures to ensure and demonstrate compliance with data protection principles. This includes maintaining documentation of processing activities, conducting data protection impact assessments where required, and implementing data protection by design and by default in our systems and processes.

14. Data Breach Notification

In the event of a personal data breach that is likely to result in a high risk to the rights and freedoms of data subjects, we will:

- Notify the relevant supervisory authority within 72 hours of becoming aware of the breach
- Inform affected data subjects without undue delay
- Document all breaches, including facts, effects, and remedial actions taken

15. International Data Transfers

When transferring personal data outside the European Economic Area (EEA), we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or adequacy decisions by the European Commission.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The most current version will be posted on our website with the effective date.

17. Contact Information

For any questions or concerns regarding this Privacy Policy, our data practices, or to exercise your data subject rights, please contact our Data Protection Officer:

Email: gdpr@schipholtravel.com

Address: Schiphol Boulevard 235, 1118 BH Luchthaven Schiphol, the Netherlands

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