PRIVACY POLICY

SKY ALPS S.r.l. is constantly committed to protecting the online and offline privacy of its users.

This privacy policy has been prepared pursuant to section 13 of the EU Regulation 2016/679 (hereinafter **"GDPR"**), as well as pursuant to Italian Legislative Decree 196/2003 as amended by the Italian Legislative Decree 101/18 (hereinafter, together with the GDPR, the **"Applicable Law"**) in order to inform you about our privacy policy, to understand how your personal information is processed when you use our website (https://www.skyalps.com hereinafter **"Website"**) and, where applicable, to give your express and informed consent to the processing of your personal data. The information and data provided by you or otherwise acquired when using the services of Sky Alps, such as for example the booking of the flight and/or additional services, the management of the booking, the check-in, the sending of communications relating to the status of the service in case of need, the access to the reserved area of the Website, as well as the sending of updated news on activities and promotions also of co-marketing, newsletters, etc. and, where applicable, the enrolment and participation in the SkyAlps Circle Loyalty Programme (the "**Programme**") (hereinafter the **"Services"**) will be processed in compliance with the provisions of the Applicable Law and Sky Alps' confidentiality obligations.

According to the provisions of the GDPR, the processing carried out by Sky Alps shall be based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity and confidentiality.

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1. Data Controller

The data controller of the processing carried out through the Website is Sky Alps S.r.l. with registered office in Bolzano, Piazza del Grano no. 3, postal code 39100, tax code and VAT no. 03067170211 (**"Sky Alps"** or **"Data Controller"**)

For any information regarding the processing of personal data by Sky Alps, including the list of data processors, please refer to privacy@skyalps.com.

2. Data Protection Officer

Due to the processing carried out by Sky Alps, the Data Controller has deemed it necessary to appoint, in accordance with section 37 of the GDPR, a Data Protection Officer whom you can contact by sending an e-mail to dpo@skyalps.com.

3. Personal data subject to processing

We inform you that browsing the Website may result in the processing of personal data by Sky Alps. Personal Data is considered, according to the GDPR, any information relating to an identified or identifiable natural person (**"data subject"**). An identifiable person is any natural person who can be directly or indirectly identified, especially by reference to an identifier such as a name, an identification number, location data, an online identifier or one of several specific factors, which express the physical, physiological, mental, economic, cultural or social identity of these natural persons.

The personal data processed through the Website are as follows:

a. Browsing data

During normal operation, the computer systems and software processes used to operate the Website collect personal data that is transmitted when Internet protocols are used. This data is not collected in order to be associated with identified interested parties. However, through processing and association with data held by third parties this data could allow users to be identified. This category of data includes, for example, the IP addresses or domain names of the users' computers connecting to the Website, the URI (Uniform Resource Identifier) of the websites visited, the time of the visit, the server's method of access, the size of the response file, the numerical code indicating the status of the server's response (successful, error, etc.) and other parameters relating to the user's operating system and IT infrastructure. These data are used only to obtain anonymous statistical information on the use of the Website and to check its correct functioning, to identify anomalies and/or abuses, and are deleted immediately after processing.

The data could be used to ascertain responsibility in case of any computer crimes against Sky Alps or third parties. However, as of now, except for the above case the data on web contacts do not persist for more than a few days.

b. Special categories of personal data

In the use of certain sections of the Website such as, for example, **"Online Check-in"**, **"Manage Booking"**, **"Help & Contacts"**, **"Jobs & Career"**, you may be asked to provide personal data falling within the special categories of personal data referred to in section 9 of the GDPR, verbatim the *"... data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as ... genetic data, biometric data for the purpose of uniquely identifying a natural person, health or data concerning a natural person's sex life or sexual orientation"*.

Please do not provide such data unless strictly necessary. Please note that in case of transmission of special categories of personal data without any express consent to process such data (which, however, obviously allows you to send a curriculum vitae, send a request for information, request special assistance at the airport), Sky Alps cannot be held liable in any way, nor can you object to such processing, as in this case the processing is authorised under section 9(2)(e) of the GDPR as it concerns data manifestly made public by the data subject. However, we would like to point out, as mentioned above, that it is important to give your explicit consent to the processing of special categories of personal data, if you decide to disclose such information.

We also inform you that Sky Alps may analyse your social professional profiles available on the Internet (e.g. LinkedIn or similar) for selection purposes.

c. Data provided voluntarily by the data subject

The use of some Services of the Website may involve the processing of personal data of third parties that you have provided to Sky Alps. With respect to such cases, you act as an independent data controller and assume all legal obligations and responsibilities.

In this sense, you shall indemnify and hold Sky Alps harmless to the fullest extent possible from any dispute, claim, request for compensation for damages from processing, etc. that may be brought against Sky Alps by third parties whose personal data have been processed through your use of the Website's functions in violation of the applicable data protection regulations.

However, should you provide or otherwise process personal data of third parties when using the Website, you hereby guarantee, and assume all related liability, that this particular processing case is based on an appropriate legal basis pursuant to section 6 of the GDPR that legitimizes the processing of the information in question.

d. Cookies and other tracking technologies

Cookies are small text files that websites visited by the user send and store on their computer or mobile device and are transmitted back to the same websites on the next visit.

Thanks to cookies, a website saves the user's processes and preferences (such as, for example, login data, selected language, font size, other display settings, etc.). So that they do not have to be entered again when the user accesses the same website or navigates from one page to another. Thus, cookies are used to authenticate the computer, monitor the session and store information concerning the activities of users accessing a website, and may also contain a unique identification code to analyse the user's browsing behaviour on the website for statistical or advertising purposes. Certain operations could not be carried out without cookies, so in certain cases they are technically necessary for the operation of the website.

Cookies can be classified according to:

- purpose: **technical**, **performance**, **tracking** and **advertising** cookies.
- duration: **session** cookies, which are automatically deleted when the browser is closed; **persistent** cookies, which are stored on the user's device until a specific expiry date.
- origin: **first-party** cookies, **third-party** cookies.

For more information about the cookies used on the Website, please refer to: https://www.skyalps.com/it/footer/cookies

e. Data processed in connection with the SkyAlps Circle Loyalty Programme

If you enroll in the SkyAlps Circle Loyalty Programme, Sky Alps may additionally process the following categories of personal data:

- registration and identification data: name, surname, date of birth, email address, postal address, and other details provided upon enrolment (as required under Section 3.5 of the Programme Terms and Conditions);
- account and transaction data: miles accrued and redeemed, status level achieved, flight history and eligible activities;
- family pooling data: identity and verification documents of family members participating in a Family Pool, as may be required by Sky Alps pursuant to Section 10.2 of the Programme Terms and Conditions;
- minor members' data: where a member is under the age of 18, data of the minor and, where applicable, identification and consent documentation of the legal guardian, pursuant to Section 3.1 of the Programme Terms and Conditions.

4. Purpose of processing

	Purpose of processing	Legal Basis	Nature of providing the data	Consequences of failure to provide data / failure to give consent
a	**Provision of the requested services.** (i) flight booking and payment procedure; (ii) booking management (modification / cancellation, etc.); (iii) check-in procedure; (iv) sending operational communications concerning the service; (v) access to the restricted area	**Article 6(1)(b) GDPR** – performance of a contract or pre-contractual measures taken at the request of the data subject	**Mandatory** for data necessary to provide the service	Inability to complete the booking, check in, access the restricted area or receive the requested service
b	**Assistance and management of requests.** Response to requests for information, including through third parties, customer assistance and support, including in emergency situations	**Article 6(1)(b) GDPR** – performance of pre-contractual or contractual measures requested by the data subject	**Mandatory** only for data necessary to respond to the request	Inability to respond to the request or provide the requested assistance
c	**Personnel selection / applications.** Analysis of CV and application submitted through the "Work & Careers" section and contacting candidates	**Article 6(1)(b) GDPR** – pre-contractual measures taken at the request of the data subject	**Optional**, but necessary if the data subject intends to apply	Inability to assess the application or contact the candidate
d	**Verification of publicly available professional profiles of candidates.** Possible analysis of professional online profiles freely made available by the candidate (e.g. LinkedIn) to assess suitability for the position	**Article 6(1)(f) GDPR** – legitimate interest of the Data Controller in assessing the application, within the limits of relevance and non-excessiveness	Optional / not necessarily resulting from direct provision	The unavailability of such data does not prevent the application
e	**Compliance with legal obligations.** Regulatory, administrative, accounting	**Article 6(1)(c) GDPR** –	**Mandatory** for data required by law or	Inability to comply with regulatory obligations and, where applicable,

	and tax obligations, as well as obligations related to the sector-specific legislation applicable to air transport	compliance with legal obligations	necessary for compliance	to provide the service correctly
f	**Statistical analysis and improvement of products and services.** Processing of data for statistical analysis and improvement of Sky Alps' offering and services	**Article 6(1)(f) GDPR** – legitimate interest of the Data Controller in improving its products and services, within the limits of proportionality and data minimisation	**Optional** where processing requires data beyond those necessary for the service; **mandatory** only where carried out on data already lawfully collected and strictly necessary	Any failure to provide additional data does not prevent use of the services
g	**Direct marketing.** Sending newsletters, promotional communications, offers, discounts, commercial and loyalty initiatives by e-mail, SMS, post or other indicated channels	**Article 6(1)(a) GDPR** – consent of the data subject for one or more specific purposes	**Optional**	Failure to give consent does not prevent use of the services, but will not allow Sky Alps to send commercial and promotional communications
h	**Internal commercial profiling.** Analysis of identification data, flights, habits and consumer choices to personalise offers and commercial communications	**Article 6(1)(a) GDPR** – specific consent of the data subject	Optional	Failure to give consent does not prevent use of the services, but will not allow receipt of personalised offers and communications
i	**Prevention and management of disputes.** Establishment, exercise or defence of a right; management of disputes and legal matters	**Article 6(1)(f) GDPR** – legitimate interest of the Data Controller in protecting its rights	**Mandatory** within the limits of the data necessary to manage the dispute	Inability to properly manage disputes, complaints or judicial defences
j	**Management of privacy rights and data subjects' requests.** Management of requests for access, rectification, erasure, restriction, objection,	**Article 6(1)(c) GDPR** – compliance with legal obligations arising from the GDPR	**Mandatory** only for data necessary to verify the applicant's identity and manage the request	Inability to properly respond to the data subject's request

	portability and other privacy requests			
k	**Management of the SkyAlps Circle loyalty programme.** Registration for the programme, management of the member's account, accumulation/redemption of award miles, management of benefits and status levels, management of "Family Pooling" arrangements. If you participate in Family Pooling, Sky Alps may process the personal data necessary to verify family eligibility, manage the pool and prevent abuse or improper use of the Programme	**Article 6(1)(b) GDPR** – performance of the contract relating to participation in the Sky Alps Circle programme	**Mandatory** for data necessary for registration and management of the Sky Alps Circle programme	Inability to join the Sky Alps Circle programme or use the related benefits
l	**Marketing relating to the Sky Alps Circle loyalty programme.** Sending newsletters and promotional communications connected with the Sky Alps Circle loyalty programme	**Article 6(1)(a) GDPR** – consent	**Optional**	Failure to give consent does not affect participation in the Sky Alps Circle programme, but prevents the sending of promotional communications relating to the Sky Alps Circle programme
m	**Google Ads Customer Match / personalised advertising on Google.** Use of contact data and data relating to the relationship with Sky Alps to create customised audiences and display personalised Sky Alps advertisements through Google Ads Customer Match	**Article 6(1)(a) GDPR** – specific and separate consent of the data subject	**Optional**	Failure to give consent does not affect the possibility of purchasing flights or using Sky Alps services, but results in exclusion from this specific personalised advertising activity

For the purposes set out in point 4.k, the user's personal data is not processed for profiling purposes, including the analysis of travel habits, preferences or behaviour, nor for market research purposes. Participation in the Sky Alps Circle Programme is not conditional upon consent to marketing activities.

Where processing is based on consent, such consent is always freely given, specific, informed and revocable at any time, just as easily as it was given.

5. Categories of recipients of personal data.

Your personal data may be shared, for the purposes set out in section 4 above, with:

- people who can access the data by virtue of legal provisions provided for by the law of the European Union or the law of the Member State to which the Data Controller is subject, including the Central Directorate for Immigration and the Border Police. Pursuant to section 13 of the GDPR and following the provisions of section 8 of Directive (EU) 2016/681 of 27 April 2016 on the use of Passenger Name Record (PNR) data, air carriers are obliged to transfer Passenger Name Record (PNR) data to the Passenger Information Unit (PIU) database of the Member State of arrival and departure of the flight. The data will be processed in accordance with Applicable Law and for the purpose of preventing, detecting, investigating and prosecuting terrorist offences and serious crime.
    - Specific disclosure for flights to and from France: In accordance with Article L. 232-7 of the French Internal Security Code (Code de la sécurité intérieure), the Carrier is required to transmit passengers' reservation (PNR), check-in and boarding data (API) to the French administration, in accordance with the procedures and for the purposes specified in Decree No. 2014-1095 of 26 September 2014, as amended by Decree No. 2018-714 of 3 August 2018.
- our employees, after designation as authorised person (acting under the authority of the Data Controller), system administrator, provided that they are previously and adequately instructed to this effect by the Data Controller.
- external parties who perform functions closely connected or instrumental to the activity of air transport, in their capacity as autonomous Data Controllers, Co-Data Controllers or Data Processors, which should be considered essential for the operation of Sky Alps flights. Your Personal Data may also be transferred to Kenyon International Emergency Services Ltd. ("Kenyon"), which will act as an independent data controller, exclusively for the management of any emergencies.
- credit card companies and service providers for anti-fraud control related to the payment process and (where necessary) activation of the anti-fraud control procedure.
- third parties such as consultants and public authorities to which Sky Alps can/should turn to in order to comply with or enforce the Services agreement.
- third parties such as police and national authorities in order to protect our rights, property or safety of you, your staff and our resources.
- public authorities and law enforcement agencies, e.g. customs and immigration authorities, following a valid request.
- subjects who carry out, in total autonomy, as separate Data Controllers, or as Data Processors appointed for this purpose by Sky Alps, purposes ancillary to the activities and services referred to at point 4, such as business partners, companies that offer advertising, marketing and communication services, companies that offer IT infrastructures and IT assistance and consultancy services as well as design and implementation of software and websites, companies that offer services useful to customize and optimize our services. For the performance of the activity referred to in section 4.m, your data may be communicated to Google LLC as a data recipient within the scope of the Google Ads Customer Match service. Should the data be transferred to the United States, the transfer will take place on the basis of the EU-US Data Privacy Framework.

- for the purposes connected with the SkyAlps Circle Loyalty Programme (point 4.k), service providers supporting the operation of the Programme, including providers of loyalty platform services, customer care and claim-management services, anti-fraud services, marketing and IT services, acting as data processors or, where applicable, as independent data controllers.

Any possible or necessary transfer of personal data shall be carried out in full compliance with the Applicable Law and the technical and organisational measures taken by the Data Controller to ensure an appropriate level of security.

6. Transfers of personal data

Your personal data is shared with recipients located outside the European Economic Area in accordance with the GDPR. Transfers will be based on an adequacy decision or the EU-US Data Privacy Framework, Standard Contractual Clauses approved by the European Commission, or other appropriate legal basis. For more information, please refer in writing to: privacy@skyalps.com.

7. Retention of data

The personal data processed for the purposes under point 4(a-b) will be kept for the time strictly necessary to achieve those purposes. However, since the processing is carried out for the provision of Services, Sky Alps will process personal data for as long as permitted by Italian law to protect its interests (section 2946 et seq. of Italian Civil Code). With regard to applications and CVs submitted through the "Jobs & Careers" section referred to in point 4.c and 4.d, the personal data will be retained as long as the position for which the CV was submitted is available or, in case of spontaneous application, until the following 12 months. This is without prejudice to the possibility for Sky Alps to contact the candidate again shortly before the indicated deadline to request an extension of this retention period.

Personal Data processed for the purposes referred to in point 4.e will be stored until the time required by the specific obligation or applicable law.

Personal Data processed for the purpose referred to in point 4.f will be retained for the time necessary to pursue Sky Alps' legitimate interest in improving its products and services, and in any case not beyond such purpose.

Personal Data processed for the purposes referred to in point 4.g and 4.h will be stored until the data subject's consent is withdrawn.

Personal data processed for the purpose of point 4.i will be retained for a period of 10 years, unless objection is made and except for the time necessary for the defence in court, while the personal data processed for the purpose of point 4.j will be retained for a period of 5 years from the closing of the request, without prejudice to retention for the time necessary to establish, exercise or defend legal claims.

With regard to SkyAlps Circle Loyalty Programme as of point 4.k, personal data will be retained for as long as necessary to manage the Programme and fulfil related legal and administrative requirements. Marketing and newsletter communications data for the purpose of point 4.l will be retained until consent is withdrawn. Upon Programme termination or Member withdrawal, personal data will be retained in accordance with applicable legislation. With regard to the transfer of data to Google for Customer Match, personal data will be retained until consent is withdrawn and for the period of time necessary to manage active advertising campaigns and for related internal reporting.

For further information on the data retention period and the criteria used to determine this period please refer in writing to: privacy@skyalps.com

8. Automated decision-making

Sky Alps does not use automated decision-making processes, including profiling as referred to in section 22(1) and (4) of the GDPR, without your consent. Should you consent to the purpose of profiling, the personal data provided

may be used to analyse or predict preferences, behaviours and attitudes in order to be able to personalise the content of the commercial communication and offer only dedicated products and offers in line with the tastes and preferences expressed, thus decreasing the number of commercial communications that we will send, and offering a better in-flight experience.

Specifically, these processing activities involve the recording, analysis and profiling of: (i) your identification data, (ii) information relating to your flights, (iii) as well as data relating to your consumption habits and choices.

The aggregation and analysis of the personal data collected allows Sky Alps to identify customers of the air transport service who share similar purchasing behaviour. Thanks to the results of these analyses, Sky Alps will be able to send commercial proposals to those who have consented.

Furthermore, as required by section 22 (3) of the GDPR, the Data Controller implements all appropriate measures to protect your rights, freedoms and legitimate interests also within the profiling process, in addition to any further and legitimate rights as better explained within point 10 ("Rights of data subjects") below of this Privacy Policy.

With regards to the automated processing necessary to administer SkyAlps Circle Loyalty Programme – including the calculation of Award Miles and Status Level qualification based on Programme rules, the management of account balances and the determination of benefit eligibility – is part of the contractual administration of the Programme and is distinct from profiling activities carried out for marketing purposes. Such administrative processing does not constitute profiling within the meaning of Article 22 GDPR and does not produce legal effects or similarly significant effects on the data subject beyond those inherent to the Programme rules.

9. Rights of data subjects

You may at any time revoke your consent to the processing of your personal data for all further processing that is not necessary for the purpose of providing the Services. However, please note that the revocation of your consent does not affect the lawfulness of the processing based on the consent before the revocation, as provided for in section 7(3) of the European GDPR.

In addition, pursuant to section 15 et seq. of the GDPR, you have the right to ask Sky Alps at any time for access to your Personal Data, to rectify or erase it or to object to its processing, you have the right to request the restriction of processing in the cases provided for by section 18 of the GDPR, as well as to obtain in a structured, commonly used and machine-readable format the data concerning you, in the cases provided for by section 20 of the GDPR.

With specific regard to direct marketing and newsletter communications, including those related to the Sky Alps Circle Loyalty Programme, you may withdraw your consent at any time without affecting your ability to participate in the Programme. Withdrawal of consent does not affect the lawfulness of any processing carried out on the basis of consent before its withdrawal.

For any request, please refer in writing to: privacy@skyalps.com.

However, you always have the right to lodge a complaint with the competent Italian Supervisory Authority (*"Garante per la Protezione dei Dati Personali"*), pursuant to section 77 of the GDPR, if you believe that the processing of your personal data is contrary to the legislation in force.

10. Updates

Sky Alps reserves the right to change or update this policy, in part or in full, also due to changes in the applicable legislation. You will be informed of such changes through their publication on the Website. Hence, Sky Alps invites you to regularly visit this section to get the most recent and up to date version of the privacy policy so that you are always up to date with the data collected and used by Sky Alps.

Last update: October 2026