

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

The processing that we intend to carry out, with your specific consent where necessary, for the following purposes:

- a. enable the provision of the Services you have requested, i.e.: (i) flight booking; (ii) management of the booking (modification or cancellation of the booking, etc.); (iii) check-in procedure; (iv) sending communications regarding the status of the Service in case of need; (v) access to the reserved area of the Website;
- b. respond to requests for assistance or information and provide assistance, including through third parties, in emergency situations;
- c. analyse applications and CVs and re-contact candidates who have submitted their applications via the "Jobs & Careers" section;
- d. fulfil legal, accounting and tax obligations;
- e. processing of statistics in order to improve the products and services offered by Sky Alps;
- f. provide you with updated news on Sky Alps activities and promotions, as well as on co-marketing promotions for a better travel experience, by sending you newsletters, advertising material and/or communications and information of a commercial and direct marketing nature on our services and products, on the relevant offers, on discounts and on any other promotional and loyalty initiative adopted by us, both through traditional and fully automated contact systems, such as, for example, through your home address and/or e-mail address, or even through SMS messages;
- g. record, analyse and profile your identification data, information relating to your flights, and data relating to your consumer habits and choices;

- h. prevent and conduct disputes and other legal matters and for the defense in the event of legal proceedings;
- i. handle data protection requests and requests from other data subjects, pursuant to section 15 et seq. of the GDPR;
- j. administer the SkyAlps Circle Loyalty Programme, including registration and management of the Member's account, accrual and redemption of Award Miles, management of benefits (including by sending you communications related to the awards of benefits), determination and renewal of Status Levels, and management of Family Pooling arrangements. If you participate in Family Pooling, Sky Alps may process personal data necessary to verify family eligibility, manage the pool and prevent abuse or misuse of the Programme, in accordance with the Programme rules. Supporting documentation requested for verification purposes will be used exclusively for such purposes and retained only for the time strictly necessary. Additionally, upon your express consent, SkyAlps may process your personal data in order to send you newsletters and direct marketing communications regarding offers, discounts and loyalty initiatives related to the Programme.

5. Legal basis and mandatory or optional provision of data

The legal basis for the processing of Personal Data for the purposes set out in point 4 (a-b-c) is section 6(1)(b) of the GDPR as the processing is necessary for the provision of the Services or to respond to requests from the data subject. The provision of personal data for these purposes is optional. However, failure to provide such data would make it impossible to activate the Services provided by the Website, respond to requests or evaluate CVs. With specific reference to the purposes of points 4. e, 4.h and 4.c and the related analysis of professional social profiles made freely available on the Internet referred to in point 3.b of this Policy, the legal basis for the processing is section 6(1)(f) of the GDPR, i.e. the legitimate interest of Sky Alps in verifying any risks as to the suitability of the candidate for the specific open position.

The purposes referred to in points 4.d and 4.i represent legitimate processing of personal data within the meaning of section 6(1)(c) of the GDPR. Once personal data is provided, the processing is necessary to comply with a legal obligation to which Sky Alps is subject.

The legal basis for the processing of personal data for the purposes set out in points 4.f and 4.g is section 6(1)(a) of the GDPR, i.e. consent. The provision of personal data for the purposes referred to in the aforementioned points is optional. Failure to provide such data for the purpose referred to in section 4.f will in no way prevent the use of the Services but may not allow us to let you fully enjoy the

benefits offered through advertising, commercial communications and direct marketing communications and inform you about additional services, discounts and promotions.

The provision of personal data necessary for the administration of the SkyAlps Circle Loyalty Programme is required to create and manage your loyalty account and to assign miles, status and related benefits. The legal basis of such processing of personal data within the SkyAlps Circle Loyalty Programme, as set out in point 4.j, is section 6(1)(b) of the GDPR, as the processing is necessary for the performance of the contract concerning your participation in the Programme. Failure to provide personal data necessary for the administration makes participation in the Programme or benefiting from the related services and advantages impossible. For marketing and newsletter communications related to the Programme the legal basis for the processing is consent pursuant to section 6(1)(a) of the GDPR. Your consent to receive marketing communications and newsletters is separate from the Programme participation, and you may accept or decline marketing communications independently upon enrollment in the Programme.

For the purposes set out in point 4.j, your personal data are not processed for profiling purposes, including the analysis of travel habits, preferences or behavior, or for market research. Participation in the Programme is not conditional upon consent to marketing activities.

6. 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.
- 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 purposes connected with the SkyAlps Circle Loyalty Programme (point 4.j), 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.

7. 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.

8. 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, 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.d 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.e 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.f will be stored until the data subject's consent is withdrawn.

Personal data processed for the purpose of point 4.g 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.h 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.j, 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 will be retained until consent is withdrawn. Upon Programme termination or Member withdrawal, personal data will be retained in accordance with applicable legislation.

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

9. 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.

10. 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.

11. 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: August 2026