



PRIVACY STATEMENT

Schiphol Travel b.v.

Preface

Schiphol Travel is a business travel organization that provides exclusive travel-related services to large and medium-sized multinationals.

Schiphol Travel was founded in 2000 and has not had any data breach since. We are proud of this and we plan to remain breach-free for many years to come. This statement contains the description of how Schiphol Travel has incorporated the rights and obligations from the regulation into its policies and business processes.

In order to provide the best possible service to customers and their passengers, Schiphol Travel processes personal data of the traveler. In the context of the legislation, we explain which personal data we process, what we do with it and with which technical and organizational measures we guarantee that the processing complies with the requirements of the legislation to protect the rights of the traveler.

Definitions

In this statement we use the following terms:

- The **client** is a legal person or natural person, acting in the exercise of a profession or company that instructs Schiphol Travel to provide services in the field of travel. In this document, the client is the same as the **controller**, in the context of the GDPR. The controller determines which data is processed, and determines the purpose (the journey) and the means (the use of the services of Schiphol Travel).
- The **traveler** is the person to whom one (or more) service(s) is (are) provided on the basis of the agreement concluded with the client. In this document the traveler is equal to the **data subject** in the context of the GDPR.
- Schiphol Travel fulfills the role of **processor** in the context of legislation. Also for information that is provided directly to Schiphol Travel by the traveler, Schiphol Travel is only the **processor**. The client remains responsible as **controller** because this information is provided under the agreement.

Terms and conditions

Articles 10.1 and 10.2 of the ANVR Business Conditions, which apply as general terms and conditions to all (framework) agreements with Schiphol Travel, concern the EU Regulation 2016/679, better known as the General Data Protection Regulation (GDPR) (hereinafter "the legislation").

These articles describe the lawfulness of the processing of personal data, as well as the responsibilities with regard to the processing of that data.

What personal data do we process and to what means?

In order to provide the best possible service, we process a lot of personal data. These personal data consist of the data provided to us by the client, plus information that has been supplemented by the travelers. The table below contains all types of personal data and the services we use them for. The dots indicate that that type of personal data is used for that service.

	Bookings	Communication	Reports	Duty of Care	Visa	Parking service	Taxi service	VIP service	Auditing
Gender ¹	•				•				
Full Name	•	•	•	•	•	•	•	•	•
Private address					•		•	•	
Private phone number	•	•				•	•	•	
Birthdate, -city and -country					•				
Nationality ²					•				
Passport or ID-details					•				
Drivers license	•								
Frequent Flyer details	•								
Family Details	•	•		•	•		•	•	•
Job details ³	•		•	•					•
Travel preferences ⁴	•	•				•	•	•	•
Travel rights ⁵	•		•			•	•	•	•
Travel history ⁶			•						•
Credit card details	•				•	•	•	•	•
Login details for our online tools	•	•							

¹ According to the passport or travel document used for traveling

² The nationality under which is travelled

³ Such as function, work telephone, work e-mail, department, manager etc.

⁴ Chair preference, lounge access, room preference, car preference etc.

⁵ What the traveler is entitled to according to the client

⁶ History of journeys, including choices made, travel policy compliance and financial data

For each traveler, only the data types that apply to that traveler will be processed.

The traveler or client has to give explicit permission before any personal data is processed for a purpose other than that for which it was originally provided. This permission can also be given implicitly because the traveler or client gives an order in which it can reasonably be assumed that the data is processed to fulfil that order.

In an emergency situation, Schiphol Travel will use personal data to protect the traveler from life-threatening dangers. This is reported to the client afterwards.

How do we protect personal data?

Personal data are important both for us and for the traveler. That is why we take intensive measures to prevent this data from being lost or come in the hands of third parties.

We do not register more data than agreed in the contract for our services. The personal data will only be used in accordance with the written agreement.

Data that is no longer needed is deleted after a retention period of 14 days. The client must clearly indicate when certain personal data no longer needs to be processed. Data in backups is automatically deleted after the retention period of the backups. It is not reasonably possible to delete specific data from backups.

Personal traveler information is available on a need-to-know basis within Schiphol Travel. Data is only available to authorized employees. Schiphol Travel employees need a unique user name and password to perform their tasks. In addition, measures have been taken to make the intentional and unintentional misuse of login information by employees and third parties more difficult, such as two-factor authentication for external access and automated screening and logging of certain means of communication.

Taking into account the available technology, the implementation costs, as well as the nature, the size, the context and the processing objectives and in terms of probability and severity of risks to the rights and freedoms of individuals, we shall take appropriate technical and organizational measures to ensure a risk-adapted level of security, including, where appropriate, the following:

- The pseudonymisation and encryption of personal data;
- The ability to guarantee on a permanent basis the confidentiality, integrity, availability and resilience of the processing systems and services;
- The ability to repair the availability of and access to personal data in a timely manner in the event of a physical or technical incident;
- A procedure for testing, assessing and evaluating the effectiveness of the technical and organizational measures to secure the processing at regular intervals.

New employees of Schiphol Travel will only be accepted if a Declaration on Behaviour can be issued in the categories Information, Money and Business Transactions by the Ministry of Justice and Security. This employee is also contractually bound to the confidentiality of customer and personal data.

Where the client is legally obliged to report the processing of data to the Dutch Data Protection Authority, Schiphol Travel will provide all possible and reasonable cooperation in the fulfilment of this obligation.

Schiphol Travel makes available to the client all information necessary to demonstrate compliance with legal obligations. Audits by the client or an agency appointed by the client are made possible and co-operation is granted, as long as an instruction does not infringe applicable legislation. Audits at the request of the client are always at the expense of the client, unless due to a security incident or otherwise by Schiphol Travel an audit is deemed necessary or imposed by the Authority for Personal Data.

The data, stored on systems of Schiphol Travel, are further protected by firewalls and physical access security. Encryption is used wherever possible. The external administrator of the automation systems perform their work in compliance with the GDPR legislation. New systems are being developed on the basis of privacy by design.

All third parties that store or process data are required to process personal data according to the GDPR legislation. No personal data are shared with parties who cannot demonstrate sufficient compliance with this legislation.

What about the data subject rights?

In the legislation, natural persons (in this context the travelers) are granted certain rights with regard to their own personal data. This concerns the right of access, right to rectification, right to be forgotten, right to limit processing and the right to transfer personal data. In addition, the traveler is entitled to information from Schiphol Travel and the client for which the data are used (this document).

If a traveler wishes to make use of these rights, this must be indicated to the client (his / her employer). Wherever Schiphol Travel must perform actions in this context, the client will pass this on to Schiphol Travel.

A request can be submitted by the client to the appointed Account Manager. Schiphol Travel will respond to that request within three weeks. If that is not possible, we will inform the client within that period of the delay. If, in the opinion of the Data Protection Officer, a request is unfounded or excessive, it may lead to rejection of the request or that Schiphol Travel charges costs for the request. Schiphol Travel can extend the response time by two months if necessary.

If you have any questions about the implementation of the GDPR by Schiphol Travel in connection with this document, you can contact your Account Manager.