### **Privacy Policy**

Your privacy is important to us. In this we outline our privacy policies, terms and conditions. Crystal Air Ltd is committed to protecting your privacy and storing your personal information safely. This Privacy Policy outlines how Crystal Air Collects, uses, shares and protects any information which you supply to us in our business relationship.

We collect information about you to enhance your user experience while trading with Crystal Air Ltd. We recommend that you print a copy of this Privacy Policy for your future reference.

Please note that we may change, modify, add to or delete portions of this Privacy Policy at any time. When we do this, we will notify you of these changes by inserting an "updated" icon next to the link for the Privacy Policy <u>www.crystalair.ie</u> for one month from the date of the change. However, please note that it is your responsibility to regularly review the Privacy Policy of the Crystal Air site. Your continued trading with Crystal Air is deemed to be acceptance of this Privacy Policy and any changes thereto.

### 1. Protecting your Information

We are committed to protecting your personal data and to implementing appropriate technical and organisational security measures to protect it against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.

## 2. Data we Collect

To provide our products and services and provide you with information on these products and services we need to collect several categories of personal data from you. We obtain this personal data during our interaction with you via multimedia, face to face conversations and data supplied by you. and through our on-going management of your transactions. We cannot provide you with our services unless we have the necessary information.

#### These personal data categories include:

Name, address, contact details such as telephone number, mobile phone number, email address, bank details, payments, marketing preferences, telephone recordings, website usage.

In certain circumstances and as part of the booking process under special requirement

categories we may collect personal data information necessary to support the provision of service to you.

Cookies are small text files that are stored in the hard drive of your computer by websites that you visit. We use cookies to improve your experience and to provide advertising on the Crystal Air site. Cookies are used to keep a record of your preferences.

## 3. How we use your Information

We will use your personal data to provide you with a quality services and to enable us to manage your dealings with us. We may use your personal data for the following purposes:

## 3.1. Account Management

In order to set up and administer your account and manage your customer experience and contact with us we are required to process your personal data. This involves processing personal data for the purpose of your booking and account set up, monitoring, identity verification and managing your bookings.

- The processing is necessary for the performance of contracts which you are party to or in order to take specific steps prior to you entering into a business contract.
- The processing is necessary to comply with our legal obligations.
- The processing is necessary for our legitimate interests or those of a third party. It is within Crystal Air' s legitimate interest to use certain personal data to establish, maintain and review a booking and to better manage customers' accounts, enforce rights set out in the terms & conditions of booking and to ensure customers are provided with the most appropriate products and services.

## **3.2.** Customer Support

In order to respond to queries and manage and investigate any complaints we are required to process your personal data. If you contact our customer service team or if we contact you, we will use personal data such as booking information and contact history. We may monitor and record such communications, instant messaging (web chat), email and other electronic communication to help investigate any complaints and for training purposes. The processing is necessary for the performance of the booking contract which you are party to in order to take specific steps prior to you entering into a booking contract.

The processing is necessary to comply with our legal obligations.

The processing is necessary for our legitimate interests or those of a third party. It is within Crystal Airs Ltd. legitimate interest to use certain personal data to establish, maintain and review an account to allow us to better manage customers' accounts, enforce rights set out in the terms & conditions of booking and to ensure customers are provided with the most appropriate products and services and that customer complaints are resolved appropriately.

## 3.3. Marketing.

In accordance with your marketing preferences, from time to time we may provide you with information on our products and services/promotional efforts and those of carefully selected third parties (whose products and services may be unrelated to ours) which we feel may be of interest to you.

Depending on your marketing preferences and as otherwise permitted by law we may contact you by:

- (a) Non-electronic means, including by post or in person; and
- (b) Electronic means including live telephone calls, email, SMS (texts), multimedia messaging or social media (e.g. Facebook and Google).

The processing is based on your consent for the specific purpose (e.g. by opting in and receiving certain marketing communications on sign up or otherwise.

The processing is necessary for our legitimate interests or those of a third party. It is within Crystal Air's legitimate interest to provide you with information on our products and services including information that we have tailored to your interests.

### 3.4. Improving our Products & Services.

In order to improve our products, services and customer interaction we carry out customer surveys and market research which involves the processing of personal data.

The processing is necessary for our legitimate interests. It is within Crystal Air's interest to provide you with the best customer experience by ensuring that we continually improve our processes and offerings.

### 4. Sharing your Information

There are several circumstances in which we may share your personal data and with other parties. Below is a list of such potential recipients or categories of recipients with whom we may share information.

Organisations who act as service providers to Crystal Air such as providers of telecommunications, postal services, records storage, data storage, document production and destruction, IT services and security, fraud detection, customer loyalty programmes, marketing and market research, and making and receiving financial payments. We may pass personal data to our agents and service providers when relevant for these purposes.

# 5. Retention of your information

We will retain your personal data only for as long as is necessary for the purposes for which it was collected and in order to meet the legal and business requirements of managing your customer account and experience with us. In particular:

- We will retain personal data that is necessary for us to provide you with a product or service that you have requested or purchased for as long as it takes us to provide that product or service;
- We will retain your contact details for marketing purposes for as long as we have your permission to send you marketing information or for as long as we are permitted to do so, subject to your right to object at any stage;
- We will retain records of any transactions you enter into with us or products or services you receive for up to seven years after the date of the transaction.

## 6. Your rights

The General Data Protection Regulation provides you with several rights under the legislation as a data subject. We will respond to your requests within one month of the receipt of your request or inform you in circumstances where an extension may be required.

# 6.1. Right of access.

You have the right to be provided with details of the processing of your personal data and to obtain a copy of the personal data we hold about you, subject to applicable exemptions. To help us better deal with your request please provide us with the information necessary to identify you (name, address, account number) and to identify the personal data you require.

### 6.2. Right to rectification.

If the personal data we hold on you is inaccurate or incomplete you have the right to rectify such personal data and we would encourage you to ensure the personal data we hold on you is kept as up to date and accurate as possible.

## 6.3. Right to Erasure.

In certain circumstances you have the right to request the deletion of your personal data where there is no compelling reason for us to continue processing it.

### 6.4. Right to restrict processing.

In certain circumstances you can request the restriction of the processing of your personal data where you contest the accuracy of the information; where you object to processing which is based on legitimate interests; where the processing is unlawful and you wish to restrict the processing rather than seek erasure; or where we no longer require to retain your personal data but you wish the personal data to be held while you establish, exercise or defend a legal claim.

### 6.5. Right to data portability.

You can request to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller.

#### 6.6. Right to withdraw consent.

If we are processing your personal data on the legal basis of consent you have the right to withdraw your consent at any time. If you withdraw your consent, we will no longer be able to carry out processing based on your consent. However, by withdrawing your consent it does not invalidate any processing which was undertaken prior to the withdrawal of your consent.

#### 6.7. Right to object to processing.

You have the right to object to processing based on legitimate interests and to direct marketing (including profiling for the purpose of direct marketing).

Where we have indicated that we are processing your personal data based on legitimate interest you are entitled to object to such processing on grounds relating to your particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or where the processing is necessary for the establishment, exercise or defence of legal claims.

If you wish to object to receiving direct marketing please use the provided opt-outs or contact us to do so.

# 6.8. Automated Decision making including profiling.

You have the right not to be subject to automated individual decision making, including profiling, which produce legal effects concerning you or similarly significantly affect you unless it is necessary for the entry into or performance of a contract, authorised by EU or member state law, or based on your explicit consent.

# 6.9. Right to lodge a complaint with Data Protection Commissioner.

You have the right to lodge a complaint with the:

(ROI Customers) Data Protection Commissioner by emailing info@dataprotection.ie or writing to the Data Protection Commissioner, Canal House, Station Road, Port Arlington, R32 AP23 Co. Laois.

# 7. How to contact us:

If you have any questions about our Privacy Policy, our Cookies Policy or our information practices, please contact us by sending an email to <u>dataprotectionofficer@crystalair.ie</u> or by post to: Data Protection Officer, Crystal Air Ltd, Unit 3 Butterstream Business Park, Clane, Co Kildare