



SWISS FLIGHT SERVICES SA - Aérodrome de Neuchâtel - CH - 2013 Colombier
www.sfsaviation.ch Tél. - Fax +41 32 841 38 00 - Fax +41 32 841 38 84

Data protection declaration

The Swiss legislator attaches great importance to the protection of your privacy. This statement sets out our privacy policy, i.e. the treatment of personal data collected by Swiss Flight Services SA, or more generally, in the context of the services we provide.

We collect and process your personal data with the maximum care and in compliance with the applicable legal provisions; processing is limited to what is strictly necessary and only for the purposes described in this declaration.

We keep your personal data only for as long as is necessary to provide our services or as required by law. Working closely with our partners, we do our very best to protect our data from external intrusion, loss, misuse, and falsification.

This statement is based on the European Data Protection Regulation (RGPD). Although the RGPD is an EU regulation, it is of great importance to us. Swiss data protection law is heavily influenced by EU law, and Companies outside the EU or EEA are required to comply with the RGPD. Please read the following carefully.

1. Data protection officer

Swiss Flight Services SA is responsible for compliance with the applicable data protection provisions. If you have any questions about our privacy policy, please contact us at the following address :

Swiss Flight Services SA,
Administration,
Avenue de la Gare 26A
CH-2013 Colombier.

Each SFS employee is responsible for processing the data they use in the course of their professional activities.

2. Description and scope of data processing

We process the personal data that we collect in order to carry out the purchase, sale or work contracts that we conclude with you.

We also process personal data as part of our services to carry out specific aerial work (applications for personal flight permits) and to organize our aeronautical courses and training.

To the extent permitted by law, we also collect certain data from publicly available sources (e.g. debt enforcement register, land register, commercial register, press, Internet) or obtain it from public authorities and other third parties for the purpose of entering into or performing contracts with you.

The following data are considered as "Personal data":

- Personal data within the meaning of these data protection provisions is any information relating to an identified or identifiable physical person (hereinafter referred to as the "data subject").

This includes your name, e-mail address [your address and telephone number, as well as credit card, account, and VAT information if you are a registered company].

- Personal data also includes information about your use of our IT Platforms, this is usually done through the use of log files and cookies.

You will find more information on log files and cookies below.

- In principle, your personal data will be stored for a period of 10 years for all the activities related to accounts (this might be extended in the situation of contractual pretentions, such as warranties).

If your IP address is collected, it is only stored for the duration of your use of the website and is then immediately deleted or made anonymous by shortening. This is managed by our website provider, Uditis. In case of questions, please contact them through their website www.uditis.ch.

3. Intended use

We use the personal data collected by us to carry out our corporate mission, which consists of SPO and CAT Operations, in accordance with the Swiss Federal Aviation Law and related foreign laws.

In addition, we use the data for the conclusion and performance of contracts with our employees, customers, and business partners, in particular in the area of our customer services and when purchasing products or services from our suppliers and subcontractors, and for the fulfilment of our legal obligations in Switzerland and abroad. If you work for one of our customers or business partners, your personal data may also be affected.

We also process personal data about you and others to the extent permitted by law and to the extent we consider appropriate, in particular for the following purposes, in which we (and sometimes third parties) have a legitimate interest :

- Information about offers, services and other platforms on which we are present
- Communication with third parties and handling of their requests (e.g. applications, media requests)
- Advertising and information about our offers and services, if you do not object to the use of your data
- Market research, opinion surveys, media monitoring
- Exercising your rights and defending yourself in legal disputes and administrative proceedings
- Prevention of crime and other wrongdoing (e.g. internal investigations, outsourced investigations conducted by the Confederation's authorities)
- Maintaining the proper functioning of our services, in particular the IT infrastructure, our website and our other platforms

- Measures to ensure the security of information technology, buildings and installations, as well as that of our employees, other people and assets belonging to us or entrusted to us (e.g. access control, visitor lists, messaging)
- Conducting online meetings. Insofar as you have given us your tacit consent to participate in the said meeting, we process your personal data in the context of and on the basis of this consent, unless there is another legal basis or other valid reasons. A given consent may be revoked at any time; however, such revocation will have no effect on the data already processed
- Personal data required by law to be communicated to social insurance companies in connection with salaries and related benefits

4. Data treatment principles

When processing data, we consider the processing principles of lawfulness, proportionality, purpose, transparency - in particular compliance with information obligations - and data security.

5. Information about your computer, cookies

The following products and services resulting from the publication of our website, such as cookies, Google reCaptcha or Plugins, are not managed by SFS but by its Swiss service provider Infomaniak and Uditis (see the Data Protection Charter published on their websites www.infomaniak.ch and www.uditis.ch).

These partners manage the data in accordance with the new Data Protection Act and certify that the data is stored in Switzerland.

6. Transmission of your personal data

Your personal data will not be passed on, sold or otherwise transferred to third parties unless it is necessary for the performance of the contract or for our legal obligations or if you have expressly consented to it.

The Swiss authorities may also transfer data to third parties insofar as they are required to do so by legal provisions or by administrative or judicial decision. The recipients of this data are partly in Switzerland but may be located abroad.

If we transfer data to a country that does not offer adequate legal protection of data, we ensure to ask for an appropriate level of protection by means of corresponding contracts or we base ourselves on the following exceptional cases: consent, the execution of the contract, the establishment, exercise or defence of legal claims, overriding public interests, published personal data or the need to protect the integrity of the persons concerned.

Personal data may also be processed in a third country. In this case, SFS will ensure to ask for an adequate level of data protection guarantee. You may request information on the contractual guarantees mentioned at any time from the authority indicated in point 2.

However, we reserve the right to redact information for reasons of data protection or confidentiality or to provide extracts only.

7. Retention period for personal data

We process and store your personal data for as long as is necessary for the performance of our contractual and legal obligations or for the purposes for which the data is processed, i.e., for example, for the duration of a business relationship (preparation, performance and termination of a contract) and beyond that period in accordance with legal retention and documentation obligations.

We may retain personal data for the period during which claims may be made against us and because we are obliged to do so by law or by legitimate business interests (e.g. for evidence or documentation purposes).

The length of time we retain data in the context of our activities is governed in particular by the following laws :

- Swiss Federal Aviation Law
- The Swiss Code of Obligations
- The Swiss Data Protection Law

8. Data Security

We take appropriate technical and organisational security measures to protect your personal data from unauthorised access or misuse, such as the development of guidelines, training, IT and network security solutions, access control and restriction, encryption of data, media and transmissions, pseudonymisation and other controls.

9. Changes to this data protection policy

We reserve the right to modify this privacy policy at any time with effect for the future. An updated version is available on the website.

We invite you to consult the website regularly and to inform yourself about the current data protection policy.

10. Obligation to make personal data available

As part of our business relationship, you are obliged to provide us with the personal data that is necessary for the conclusion and management of a business relationship and the performance of any contractual obligations arising therefrom (as a general rule, you are under no legal obligation to provide us with data).

Without this personal data, we are generally unable to enter into and perform a contract with you (or the entity or person representing you) or to meet our legal obligations.

11. Profiling and automatic decision

No profiling is carried out by our company, either with or without personal data.

If by any chance we need profiling data, these are established by partners established in Switzerland, the EU or EEA area and comply at least with the RGPD requirements.

In the case of profiling data received, SFS certifies that the data is considered for information purposes only and that no automated decision-making is involved.

12. Your rights

Under the data protection law applicable to you and insofar as its provisions so provide (as in the case of the RGPD), you have the right to information, the right to rectification, the right to erasure, the right to restriction of the processing of your data, the right to object to our processing of your data and the right to have some of your data transferred to another entity (data portability).

Please note, however, that we reserve the right to apply the restrictions provided for by law, for example when we are obliged to retain and process certain data, have an overriding interest in doing so (insofar as we can rely on this) or need to do so in order to exercise our rights.

If charges are applicable, we will inform you in advance. We draw your attention to your right to revoke your consent.

Please note that exercising these rights may conflict with contractual agreements and have consequences such as early termination of a contract or the application of charges. If this is the case, we will inform you about the situation in order to find a mutually acceptable solution.

Any data subject also has the right to take legal action or lodge a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

You have the right to request information about your personal data that we process.

- The purpose of the processing
- The storage period or, if this is not possible, the criteria for determining this period
- The origin of your data if it has not been collected from you
- and, where applicable, the recipients or categories of recipients to whom the personal data is communicated

You also have the right to revoke any consent you may have given to the use of your personal data at any time.

You can assert these rights at any time by contacting us at the contact address indicated.

If you believe that we are processing your personal data in breach of the applicable data protection provisions, you have the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner.

13. Modifications

We reserve the right to amend this privacy statement at any time and without prior notice. The valid version is the one currently published on our website. Where appropriate, we will inform you by e-mail or other appropriate means of any updates to this declaration.

1st September 2023