# Privacy policy at PLL LOT

The privacy and cookie files policy of Polskie Linie Lotnicze LOT S.A.

Last update on [18.11.2025]

## **GENERAL INFORMATION**

This Privacy Policy ("Policy") applies to the personal data of the passengers ("Passengers") of Polskie Linie Lotnicze LOT S.A. with its registered office in Warsaw ("PLL LOT" or "we"), and persons for which we provide electronically supplied services through the website <a href="www.lot.com">www.lot.com</a> ("Website"), and also whose data we process in connection with the use of the mobile application, our social media profiles and as part of other content or online services which we provide (jointly "Users"). The content of the Regulations for the provision of electronically supplied services is available <a href="here">here</a>. The website, our mobile application and social media profiles, as well as other content or services, which we may provide online, are hereinafter jointly referred to as "Services".

The Controller of Users' personal data within the meaning of relevant, applicable provisions on the protection of personal data, including the provisions of the Regulation of the European Parliament and the Council (EU) of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing directive 95/46/EC (General Data Protection Regulation) ("GDPR"), is PLL LOT.

We can be contacted by filling in <u>contact form</u> or in writing to the address of our registered office: ul. Komitetu Obrony Robotników 43, 02-146 Warszawa.

We have appointed a data protection officer – it is a person who can be contacted by Users in all matters concerning the processing of personal data and the use of data processing rights.

The Personal Data Protection Officer can be contacted by e-mail: iod@lot.pl, filling in contact form or in writing to the address of our registered office: ul. Komitetu Obrony Robotników 43, 02-146 Warszawa.

#### II. WHAT ARE USERS' RIGHTS?

Subject to the principles set out in Articles 15-18 and Articles 20-21 of the GDPR, Users have at any time the following rights:

the right to access personal data, the right to demand rectification of personal data, the right to demand deletion of personal data, the right to restrict the processing of personal data, the right to transfer personal data – i.e. the right to receive personal data from PLL LOT in a structured, commonly used IT format suitable for machine reading; the right to transfer personal data applies in relation to that data that is processed on the basis of an agreement or consent, the right to raise an objection to the processing of personal data – where data is processed on the basis of the legitimate interest of PLL LOT.

Moreover, in the case of processing of personal data on the basis of a consent, Users are entitled to withdraw the consent to the processing of data at any time. The withdrawal of consent does not affect the legality of processing which was made on the basis of a consent before its withdrawal.

In order to exercise the above-mentioned rights, one should call the 24-hour Client Service Centre 0 801 703 703 or ticket sales offices or the Data Protection Officer: iod@lot.pl.

Users are also entitled to lodge a complaint with a supervisory authority dealing with personal data protection. The leading supervisory authority for PLL LOT is the President of the Personal Data Protection Office.

### III. WHICH PERSONAL DATA OF USERS DO WE PROCESS?

We process the following categories of personal data:

- · Technical data: inter alia type and version of the browser, operating system used by the User, website from which the User was redirected to the Website (URL address of the redirecting website), and data of the internet service provider or mobile network operator, internet protocol address (IP), cookie files and similar technologies described in more detail in Chapter IX of the Policy, device identifier, MAC physical address, device and browser settings.
- · Analytical data: inter alia data about usage of the Website, including visited subpages, viewed content, downloaded documents, other undertaken actions, the way of using different functionalities, booking history, agreements concluded with us and services provided by us, and also other interactions with us, our content or our communication, including that provided by external service providers (e.g. Adobe).
- · Data from other sources: demographic, geographical data, data about interactions with external service providers.
- · Data of the PLL LOT account: inter alia title, name and surname, gender, cell phone number, e-mail address, correspondence address, card number in the loyalty program, booking history, agreements concluded with us and services provided by us, preferences of the User.
- · Data on contract of carriage: inter alia date of birth of the Passenger, gender of the Passenger, name and surname of the Passenger, citizenship of the

Passenger, country of residence of the Passenger, validity period of the travel document of the Passenger, identifier of the travel document of the Passenger, country of issue of the travel document of the Passenger, type of travel document of the Passenger, name and surname of the Client, citizenship of the Client, phone number of the Client.

- Data on marketing communication: inter alia name and surname and contact data (phone number, e-mail address), information on previous bookings, and if the passenger has unfinished bookings chosen starting and destination airport, information if the flight is in one direction or also return, dates and hours of departure/arrival, number of passengers, chosen type of fare, total fare cost, information if the passenger subscribes to the newsletter, booking type, chosen services, language chosen on the website/in the application.
- · Data related to ensuring safety inter alia name and surname of the User, address, phone number, IP address, data identifying geographical location, booking and transaction history, credit/debit card data, information on claims and complaints.

The processing of special categories of data (sensitive data): In some cases LOT processes special categories of personal data (sensitive data), such as data related to the state of health, for example data on motor disability in the case of Passengers with special needs.

# IV. FOR WHAT PURPOSES, ON WHAT BASIS AND HOW LONG DO WE PROCESS PERSONAL DATA?

PLL LOT processes personal data of Users for a number of purposes set out below, based on legal bases indicated below and stores them for the period given below:

processing	s of processed personal data	processing of data	period
Operation of the Website and other Services	Technical data	Performanc e of the agreement (Art. 6 par. 1 letter b of the GDPR)	for the duration of the agreeme nt or the provision
	Analytical	the GDPR)	of
Making available of the Services, including the provision of services available	data		services
through the	Data of		
Website such as	the PLL		
making a booking and enabling the management of the booking (e.g. by choosing additional services), issuing of an electronic air ticket or subscribing for a loyalty program	LOT account		

Categorie

Retention

Basis for

Purpose of

Implementation of a carriage contract

Data on carriage contract

Performanc e of the contract (Art. 6 par. 1 letter b of the GDPR) for the duration of the contract and settleme nts after its terminati on

Undertaking actions before conclusion of the contract, the exercise of rights and obligations resulting from the carriage contract and performance of other services for the Passenger related to air carriage

Dromotion	Taskaisal	Logitimoto	
Promotion,	Technical	Legitimate	no longer
advertisement	data	interest	than until
and marketing of		(Art. 6 par.	objection
our services and		1 letter f of	is raised
the products and		the GDPR),	or
services of our	Analytical	inter alia	consent
partners	Analytical	including	withdraw
	data	raising the	n
		attractivene	
		ss of the	
A di a face a fact		Services,	
Adjustment of	Data of	enhancing	
content in the		the	
Services to the	the PLL	effectivene	
interests and	LOT	ss of our	
preferences of	account	marketing	
Users, including		and sales	
displaying to		activities	
Users of		through	
personalized	Data from	directing of	
content, including	Data from	personalize	
communications,	other sources	d content	
promotions,		to Users,	
offers,		which may	
advertisements,		be	
recommendations		interested	
concerning our	Data on	by our	
products and	marketing	offer,	
services or	communic	analysis of	
promotional	ation	advertising	
actions in the		campaigns	
Services and		and	
elsewhere (e.g.		creation of	
on websites of our		more	
partners – third		tailored	
parties, in social		group of	
media), and also		recipients,	
displaying of our		settlements	
personalized		with	
content to the		providers	
users of our		of	
partners -			
suppliers of			

websites and social media, and also displaying to Users the content of our partners on the basis of the interests or preferences of Users.

advertising services

Measurement of effectiveness of marketing campaigns, including the settlement of marketing and sales activities.

Consent (if
it is
required
under
applicable
provisions)
- to the
extent
indicated in
its content

Marketing	Technical	Legitimate	no longer
communication,	data	interest	than until
including directing		(Art. 6 par.	consent
of personalized		1 letter f of	is
information		the GDPR),	revoked
concerning our		that is	or
services or	Analytical	conducting	objection
products or the	data	the	raised
services or		marketing	
products of our		of our	
partners through		products	
all distance		and	
communication	Data of	services,	
channels,	the PLL	including	
including through	LOT	enhancing	
e-mail,	account	the	
SMS/MMS,		effectivene	
notifications in the		ss of our	
browser or the		marketing	
device's operating	Dete on	and sales	
system or in the	Data on	activities by	
application;	marketing	directing	
communication	communic ation	personalize	
will be created on	alion	d	
the basis of the		communica	
interests and		tions to	
preferences of		Users	
Users;		whose	
communication		activity and	
will include inter		other data	
alia our current		indicate	
offer, information		that they	
on promotions		may be our	
and services		offer	
placed on the			
market, organized			
events and			
competitions and			
special offers,		Consent (if	
including in the		it is	
		required	
		under	
		applicable	

form of our newsletter.

provisions)

- to the
extent
indicated in
its content

Statistical, analytical and reporting, including analyses of Users' activities (including on the basis of profiling), in order to measure traffic in the Services and improve or optimize the experience of using the Services, and also reports and alerts related to the functioning of the Services, including with possible errors; statistical analyses and market research (including on the basis of profiling), including analyses of the effectiveness of

marketing and

Technical data

Analytical data

Data of the PLL LOT account

Data on marketing communic ation Legitimate interest (Art. 6 par. 1 letter f of the GDPR), i.e. improveme nt of the quality of services, raising the attractivene ss of the Services and

adapting

them to

Users'

needs

Until objection is raised

promotional
activities;
satisfaction
survey of Users,
inter alia on the
basis of a
customer service
satisfaction
survey or survey
concerning our
products and
services
(including on the
basis of profiling).

Improvement of our products and services (including on the basis of profiling)

Analytical data

In particular tests
of new
functionalities in
the Services,
correction of
errors.

Technical data

Legitimate interest (Art. 6 par. 1 letter f of the GDPR), including enhancing the attractivene ss of our products and services

Ensuring safety,	Technical	Legitimate
including	data	interest
cybersecurity		(Art. 6 par.
		1 letter f of
		the GDPR),
		including
	Analytical	ensuring
Detection and	data	safe use of
prevention of		the
threats to the		Services
Services,		and
including		protection
detection of attack		of servers
attempts, frauds,		and IT
abuses.		resources

Ensuring	Performanc	Until the
compliance with	e of	legal
legal provisions	obligations	obligation
legal provisions	•	•
	resulting	expires,
	from legal	including
	provisions	until the
	(Art. 6 par.	date of
Including use for	1 letter c of	approval
accounting,	the GDPR)	of the
bookkeeping, tax		financial
and other		report for
purposes, related		a given
to the		financial
performance of		year, or
our legal		no longer
obligations		than for a
		period of
		5 years
		from the

end of the calendar year, in which tax obligation arose.

User Service,
including
receiving and
considering
complaints,
grievances and
questions,
carrying out a
passenger
complaint
procedure in air
transport,
communication
with Users,
including through
the Client Service
Centre, ticket
sales offices, the
Website or
Services

Data of	Performanc	
the PLL	e of the	
LOT	agreement	
account	(e.g.	
	carriage	
	contract)	
	(Art. 6 par.	
	1 letter b of	
	the GDPR)	

Performanc
e of
obligations
resulting
from legal
provisions
(Art. 6 par.
1 letter c of
the GDPR)

Until the expiry of claims under carriage contract or the expiry of the limitation period for claims

Legitimate interest (Art. 6 par. 1 letter f of the GDPR) consisting

in conducting communica tion with Users, answering questions, resolving amicably contentious issues

Determination,
pursuit or defense
against claims,
including storing
of data for
archiving
(evidentiary)
purposes

Technical data

Analytical data

Legitimate interest (Art. 6 par. 1 letter f of the GDPR) i.e. securing information in the event of a legal need to prove facts

Until the expiry of claims

Linking up of devices and browsers or	Technical data	Legitimate interest (Art. 6 par.	Until objection is raised
operating systems used on them as belonging to the same User in order to achieve one or more	Analytical data	1 letter f of the GDPR) consisting in providing the User with	
purposes described above	Data of the PLL LOT account	uniform experience when using the Services from different devices	

Data on marketing communic ation

Combining data	Technical	Legitimate	Until the
coming from	data	interest	expiry of
different sources		(Art. 6 par.	the
(including offline),		1 letter f of	retention
which were		the GDPR)	periods
originally		consisting	of source
collected in	Analytical	in adjusting	data
contexts other	data	the content	
than data		and	
collected online in		communica	
order to achieve		tion with	
one or more		the User to	
purposes	Data of	the history	
described above	the PLL	of the	
	LOT	relationship	
		with them	

account

Data on marketing communic ation

#### V. VOLUNTARY NATURE OR OBLIGATION TO PROVIDE DATA

Depending on the purpose of the processing of personal data, their provision may be a condition for the conclusion of an agreement (e.g. in the case of conclusion of a carriage contract) or may be voluntary, but necessary for using our services provided as part of the Services or necessary for User Service, including considering a complaint or grievance.

The provision of personal data for promotional, advertising and marketing purposes is voluntary.

#### VI. SOURCES OF DATA

In principle, the data which we process we have collected from Users who provided them to us by filling in appropriate forms e.g. during booking or by creating a PLL LOT account. We can also collect Users' data by observing them (e.g. the way of using the Services) or create statistics concerning Users or their profiles. We can also obtain Users' data from our partners, e.g. within the context of marketing or sales activities we obtain data on the effectiveness of the activities of our partners aimed at the promotion or sale of our services, or of our activities addressed at Users (e.g. internet identifiers of Users who have used our services through the services of our partner), and also data which allow us to undertake marketing, advertising activities addressed at Users, who may be interested by our offer (e.g. the demographic, geographical, interests or preferences group to which the User belongs, together with an internet identifier allowing to display them our content).

# VII. PROCESSING PASSENGERS' PERSONAL DATA – ADDITIONAL INFORMATION

Due to the necessity of ensuring a safe and lawful journey to our Passengers, we also inform that PLL LOT will process Passengers' personal data in connection with the performance of obligations imposed on PLL LOT under legal provisions. The processing of Passengers' data will take place in particular to:

fulfil the requirements related to the crossing of a border by the Passenger, inter alia to fulfil immigration, customs and other requirements related to the crossing of the border in destination countries; prevent terrorism and other international crimes and to combat them, including to compare Passengers' data to the lists of passengers constituting a threat for aviation security; ensure a safe flight to Passengers, and also US safety, in the case of travel between the European Union and the United States.

Detailed rules for the processing of Passengers' personal data travelling between the European Union and the United States have been described in Chapter XII of this Policy.

#### VIII. HOW LONG DO WE STORE USERS' DATA?

The period of storage of Users' personal data depends on the purpose for which this processing is made. We store personal data for the period necessary to achieve the purposes set out in the Policy, including for the period required by legal provisions or until the expiry of the limitation period for claims. Detailed information has been provided in chapter IV of the Policy. However, we inform that personal data on the travel and bookings of Passengers traveling between the European Union and the United States, referred to as "data concerning the passenger's flight" or "PNR data" (PNR = Passenger Name Record) hereinafter as "PNR data", will be stored for the period indicated in chapter XII of this Policy.

#### IX. TRANSFERRING PERSONAL DATA

PLL LOT may make available Users' personal data to other persons, authorities, institutions and carriers, which in connection with applicable legal provisions, as well as international agreements are authorized to receive such information, or if the transfer of data is necessary to fulfill legitimate purposes pursued by PLL LOT or recipients of data, including inter alia to fulfill immigration, customs and other requirements related to the crossing of a border in destination countries.

PLL LOT may also transfer Users' personal data to their suppliers to whom PLL LOT commissions services related to the processing of personal data e.g. providers of hosting services, providers of analytical, advertising and marketing services, tools used to send marketing communication or entities providing services in the field of administration, maintenance and management of the Website. Such entities will usually process data on the basis of an entrustment agreement concluded with PLL LOT and only in accordance with PLL LOT's instructions. On the basis of legitimate interest or consent, we may also make available Users' data to our advertising and marketing partners, including providers of analytical and marketing services, which will process them for their purposes as independent controllers.

Where we process statistical data on the User's activity in the PLL LOT profile in the Facebook and Instagram community services, as well as in the case of using pixel or the Facebook plugin on the Website or in the mobile application, there is joint controlling of Users' data between PLL LOT and Facebook Ireland Limited for the needs of creation of aggregated statistics of these Services. The arrangements setting out the scope of joint controlling, including the rules of responsibility for the processing of Users' data can be found on the website: <a href="https://www.facebook.com/legal/terms/page\_controller\_addendum">https://www.facebook.com/legal/terms/page\_controller\_addendum</a>. According to these rules, Facebook undertakes to take primary responsibility for the processing of Users' data for the needs of statistics and for the fulfillment of other relevant obligations set out in the GDPR.

We may transfer Users' data to our partners, suppliers and subcontractors localized outside the European Economic Area ("EEA"). In such cases we implement specific security measures, making every effort to transfer data to a country considered by the European Commission as providing an adequate level of protection for personal data (the list is available <a href="here">here</a>) or signing Standard Contractual Clauses approved by the European Commission and, where appropriate, implementing additional contractual, technical and organizational

measures (you may receive of copy of such clauses or other security measures, by contacting us in the manner indicated in chapter I of the Policy).

To process payments for your trips and purchases, we may work with third parties that offer payment services. They operate their own privacy policies in terms of the way in which they use your personal data. For transactions acquired in India, the governing law is Indian, including the Indian privacy act.

#### X PROTECTION OF PERSONAL DATA

We assure that we make every effort to ensure that the processing of Users' personal data takes place with the utmost respect for their privacy and with the utmost care for the safety of the processed personal data. In particular, we assure that we have undertaken all measures provided for by legal provisions to protect data transferred to us, including, in particular:

we use appropriate technical and organizational measures to ensure the protection of the processed personal data to the extent corresponding to the risk of the violation of rights and freedoms of persons whose data is processed;

measures referred to in letter a) are implemented both while specifying manners of processing (in the so-called designing phase) and during the processing itself taking into account the level of technical knowledge, the cost of implementation as well as the character, scope, context and purpose of the processing of data;

we process data respecting the rule of data protection by default; we protect data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data;

we maintain documentation required by law, including appropriate data protection policies;

we admit to the processing of data exclusively persons with appropriate authorization:

we keep the records of persons authorized to process personal data; we ensure control which personal data, when and by whom has been transferred to us and to whom it is transferred.

In particular, we use the following technical measures that prevent unauthorized persons from getting access to information and personal data processed through the Website:

cryptographic measures in the form of a VPN tunnel and encrypted SSH connection:

Amazon firewall systems; authentication with the use of RSA and DSA keys.

Specific threats related to the use of an electronically supplied service: getting unauthorized access to information concerning a User.

#### XI.COOKIE FILES AND SIMILAR TECHNOLOGIES

A cookie file is a small text file, which often contains an anonymous, unique identifier. Cookie files are created at the time when the User's browser loads a given website. The website sends the information to the browser, which subsequently creates a text file. Whenever the User returns to the same website, the browser downloads and sends such files to the website's server. More information about the use of cookie files is available on the website <a href="https://wszystkoociasteczkach.pl/">https://wszystkoociasteczkach.pl/</a>.

In addition, we use other technologies (such as tracking scripts (*pixels, web beacons*) and in applications the so-called *software development kits* (in short usually termed as SDKs), which fulfil similar functions and which allow us to monitor and improve the Services and e-mail communication. Speaking in the Policy about cookie files, this term includes also such similar technologies. More information about our practices related to the protection of personal data and privacy, and also the purposes of the processing of personal data collected by cookie files, the User can find in the remaining chapters of this Policy.

According to the purpose of their use, cookie files used by us can be divided into the following categories:

#### a) Necessary cookie files

These files are necessary to ensure basic functionalities of the Services. Without them it is not possible to use the requested services, such as e.g. logging in to the PLL LOT account, filling in a booking form. In the case of disabling such cookie files, some elements of the Services may become inaccessible to the User (e.g. logging in to the PLL LOT account, filling in a booking form). These files are also necessary to ensure the safety of using the Services.

#### b) Analytical cookie files

These files help us improve and optimize Users' experiences related to the use of the Services. They help us measure the way of using the Services, so that we can improve their functioning and comfort of use (including to test new functionalities or correct errors). These files are used to collect technical and analytical data, such as recently visited pages in the Website, number of visited pages, information on getting acquainted with e-mail communication, information about clicks in different parts of the Services and e-mail communication, as well as on the time between different clicks.

#### c) Functional cookie files

We may use cookie files, which are not necessary for using the Website, however, they allow to use some functions. These files, for example, collect information concerning the User's interactions with services offered in the Services and may be used in order to remember the User's preferences (such as choice of language / currency), interests and the way of presentation of the website (such as font size). We may ask the User's permission for using such cookie files when they want to use a specific functionality in the Services.

#### d) Advertising cookie files

We use these files in order to collect information concerning the way of using the Services, in order to adjust advertisements to the User and their possible interests or preferences. In addition, they are used to limit the number of displays of the same advertisement and to measure the effectiveness of advertising campaigns. We may make available this information to other entities which help in the management of internet advertisements – more details are available below in the part "Third Parties".

## Third Parties

The use by the User of the Services may cause using some cookie files which we do not control. This may take place in a situation when the part of the Website visited by the User uses third parties' tools for data analytics or automatization/marketing management or contains content displayed from third parties' websites such as e.g. YouTube or Facebook. We recommend getting acquainted with the privacy and cookie files policies of these services in order to find out in what way these entities use cookie files and if the User's data from cookie files are transferred to third countries. The list of third parties which place cookie files in the Services is below.

Purpose	Third party	Retention period
Analytics	<u>Adobe</u>	24 months

(opens in a new tab)

<u>Criteo</u>

24 months

(opens in a new tab)

Rental cars

24 months

(opens in a new tab)

Booking.com

24 months

(opens in a new tab)

Microsoft (Clarity)

13 months

(opens in a new tab)

Google Inc

13 months

(opens in a new tab)

Functionality

Advertisements

Adobe

12 months

(opens in a new tab)

Google Inc

13 months

(opens in a new tab)

Bing 24 months

(opens in a new tab)

<u>Facebook</u> 24 months

(opens in a new tab)

<u>Criteo</u> 13 months

(opens in a new tab)

CJ 13 months

(opens in a new tab)

Revhunter

12 months

(opens in a new tab)

<u>LinkedIn</u>

12 months

(opens in a new tab)

Seznam.cz (opens in a new tab) 12 months

RTB House (opens in a new tab) 12 months

<u>Teads</u>

13 months

Social media

<u>Facebook</u>

# (opens in a new tab)

How long will we process your data?

Wes store the information collected from cookie files for [maximum period 24 months].

How can you manage cookie files?

The User may, at any time, gain access and make changes of their preferences concerning cookie files by clicking [here].

## **Browser settings**

The User may express their decision whether they express their consent to the saving cookie files also on their device through browser settings. More information about what options are offered by the browser, including how to change cookie files saving settings and how to delete previously saved files, the User can find in the following links concerning the most popular browsers:

Microsoft Edge
Mozilla Firefox
Chrome
Opera
Safari

If the User would like to avoid cookie files (*web beacons*) in e-mail communication, the User may make changes in the settings of the program for reading e-mails and disable the functionality which enables remote loading of images and refrain from clicking on links.

# XII. SPECIAL RULES CONCERNING THE PROCESSING OF THE DATA OF PASSENGERS TRAVELLING BETWEEN THE EUROPEAN UNION AND THE UNITED STATES

Due to the fact that the Passengers of PLL LOT travel between the European Union and the United States, below we present special rules concerning the processing of their personal data

PLL LOT, according to US law and the international agreement between the European Union and the United States, will transfer PNR data to the United States Department of Homeland Security (hereinafter referred to as "DHS"). This data shall be transferred for the purposes set out in Chapter IV of the Policy.

PLL LOT will transfer the Passenger's data collected before the travel (Advance Passenger Information – API i.e. in particular information from the Passenger's passport that are collected during the check-in) to border control authorities. This data shall be transferred for the purposes set out in Chapter IV of the Policy.

In order to obtain exhaustive explanations on the manner of handling PNR data concerning flights between the European Union and the United States by DHS, one can become acquainted with the obligations of the United States Department of Homeland Security ("PNR Obligations") published in the US Federal Register vol. 64, No. 131, page 41543. PNR data received in connection with flights between the EU and the USA may be made available to other domestic and foreign governmental authorities responsible for combatting terrorism or law enforcement for the purposes set out in Chapter IV of the Policy.

Some PNR data belonging to special categories of data within the meaning of 9 GDPR can be entered in the PNR if they are transferred to DHS from community booking systems or air carriers departure control. Such PNR data, which belong to special categories of data, include in particular, certain information on the Passenger's racial or ethnic origin, their political views, religious convictions, health condition or sexual

orientation. DHS has undertaken not to use any PNR data belonging to special categories of data, which they receive from booking systems or air carriers departure control in the EU. DHS has launched an automatic filtering program, preventing the use of PNR data belonging to the category of special PNR data.

PNR data from flights between the EU and the USA will be stored by DHS for 3 years and six months, unless DHS, during this time, makes manual access to this particular PNR data. In such cases, PNR data will be stored in DHS for an additional period of eight years. Moreover, information related to particular enforcement records will be kept in DHS by the time such a record is archived.

The obligation to ensure that all DHS departments handle personal information in accordance with the relevant act rests with the Chief Privacy Officer in the Department of Homeland Security. This Officer is independent from all DHS directorates, and their findings are binding for the entire department. In order to ensure that DHS strictly follows provisions and uses proper safety measures, they will exercise general supervision over the program.

Every passenger may demand from DHS additional information on the type of PNR Data made available to DHS and ask to be issued a copy of data included in DHS database. To the extent it is permitted by the Freedom of Information Act and other statutory and implementing provisions and political objectives, regardless of the Passenger's nationality or place of residence, DHS will consider the request concerning documents, including also PNR documents possessed by DHS. DHS can refuse to disclose or postpone the disclosure of all PNR data or part of them in certain circumstances (e.g. if there are reasons to expect that it will disrupt pending legal proceedings or cause a disclosure of techniques and procedures used during investigations conducted by law enforcement authorities). If DHS refuses access to PNR data under the departures set out in the Freedom of Information Act, there is a possibility to lodge an appeal from this decision by virtue of administrative procedure to the Chief Privacy Officer in DHS, who on behalf of DHS is responsible for both privacy protection and data disclosure rules. The final decision is actionable in court under the provisions of US law.

Passengers may demand rectification of their PNR data included in DHS databases, contacting the following offices. DHS will take into account these rectification requests which they find justified and property substantiated.

Enquiries concerning PNR data made available to DHS or requests for making data possessed by DHS and relating to the requesting party available should be sent in writing to: Freedom of Information Act (FOIA) Request, U.S. Customs and Border Protection, 1300 Pennsylvania Avenue, N.W., Washington, D.C. 20229. Further information concerning

the procedures of submitting such requests can be found in section 19 Code of Federal Regulations, section 103.5. If someone wants to report a problem or complaint concerning PNR data or submit a request for their correction, this can be done in writing to the address: Customs and Border Protection, 1300 Pennsylvania Avenue, N.W., Washington, D.C. 20229. Decisions of DHS are subject to verification of the Chief Privacy Officer in the Department of Homeland Security, Washington, DC 20528. Any enquiries, complaints or requests for the rectification of PNR data can be also addressed to a data protection authority in the EU member state of a given Passenger for possible further examination.

If the complaint cannot be settled by DHS, the person submitting a complaint can address in writing the Chief Privacy Officer in the Department of Homeland Security: Chief Privacy Officer of the Department of Homeland Security, Washington, DC 20528. The Chief Privacy Officer will assess the situation and try to settle the dispute. One can also submit a complaint through the national data protection authority (hereinafter referred to as "DPA") i.e. the President of the Data Protection Office (UODO President). The Chief Privacy Officer has undertaken to handle complaints received from data protection authorities of EU member states on behalf of an EU citizen, if the citizen authorizes them to act in their case.

More information on the manner of using personal data by airlines can be obtained directly from airlines in a given country.

Regardless of the above information, the transfer of personal data to countries from outside the European Economic area takes place in accordance with the rules set out in Chapter V of the GDPR.