

Data protection

Air Cargo Green Capabilities is committed to protecting the personal data of our customers, prospects, and more generally, of any data subject concerned by our processing activities.

You may access the relevant Data Protection Notices by clicking on the below links. For any inquiry regarding data protection matters, you may contact us by email at sales@aircgc.com

Data protection notice: access control

Air Cargo Green Capabilities Luxembourg Airport, Luxembourg (hereafter referred to as “**Air Cargo**” or “**We**”) is committed to protecting the personal data of visitors of Air Cargo premises, or any data subject concerned by our processing activities (hereafter referred to as “**You**”).

The physical access control process grants or denies access at all entrances and exits from Air Cargo premises. This Data Protection Notice explains how we process your personal data, complying with the rules currently stated in the General Data Protection Regulation EU 2016/679 (hereafter referred to as the “**GDPR**”) on the protection of individuals with regards to the processing of personal data and on the free movement of such data.

Who is the controller of your personal data?

Air Cargo is responsible, as a data controller, for collecting and processing your personal data under in the scope of the Access Control process to have access to Air Cargo premises.

What personal data will Air Cargo process and why do we process it?

We collect data when You enter Air Cargo premises, including the following categories of data:

For visitors of Air Cargo premises:

- Name and surname
- Personal identification documents (ID/Passport)
- License plate number
- Picture (for Contractor badge only)
- Date and time of visit

For visitors of Air Cargo premises subjected to LuxAirport access control:

- Name and surname of visitor and escort
- Personal identification documents (ID/Passport) of visitor and escort
- Badge number of escort
- Date and time of visit

What are the purposes and the legal basis for Air Cargo's processing activities?

We collect and use your personal data for the following purposes:

- To ensure the security of the premises, to control and record access to/from the premises, including at entrance gates.
- To prepare escorted access with relevant authorities for visits of Air Cargo premises on airside.
- To record and report security incidents in and around the premises, and if necessary, investigate such incident.
- To provide temporary access badges for visitors and contractors.
- The legal basis for the processing of your personal data is **necessary for compliance with an applicable legal obligation**, pursuant to relevant legislation on aviation security.

Who do we share your personal data with?

We may communicate your personal data to:

- Internal employees on a need-to-know basis.
- Service providers that perform corporate security services for Air Cargo.
- The Police, law enforcement or other government and regulatory bodies or agencies, upon request and to the extent permitted by law.

How do we protect your personal data?

We have implemented technical and organizational security measures to protect your personal data from unauthorized access, improper use, alteration, unlawful or accidental destruction and loss.

The processing of your personal data is carried out through IT, electronic and manual tools, with logics strictly related to the purposes in compliance with the appropriate technical and organizational measures required by law to ensure a level of security that is adequate to the risk, in order to avoid unauthorized loss of or access to your data.

Where do we transfer your data to?

Your personal data are processed by us within the European Union and no transfer of your personal data occurs outside of the European Union/European Economic Area (EU/EEA).

For how long do we keep your data?

We will retain your personal data for 90 days, except in the event of an incident, investigation or legal proceedings.

At the end of that period your personal data will be deleted or destroyed.

What are your rights?

In accordance with the applicable data protection laws (and subject to conditions and restrictions set forth therein), You may exercise at any time the following rights in relation to your personal data:

- **Right of access**, which enables You to obtain from Air Cargo confirmation of whether your personal data is being processed or not and, if so, obtain access to such data (considering we process a large quantity of information; when exercising your right of access You should specify the transaction, information or processing activities to which your request relates)
- **Right to rectification**, which enables You to obtain from Air Cargo the correction and/or integration of any of your personal data that are incorrect and/or incomplete;
- **Right to erasure**, which enables You, in specific cases provided for by art. 17 GDPR, to obtain from Air Cargo the erasure of your personal data;
- **Right to restriction of processing**, which enables You, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by Air Cargo;
- **Right to object**, which enables You to object to the processing of your personal data when certain conditions are met;
- **Right to data portability**, which enables You, in certain cases (subject in particular to technical feasibility) and only with regard to the data You have provided to Air Cargo, to request receipt of your personal data in a structured and commonly machine-readable format.

To exercise any of these rights, You may contact us by email sales@aircgc.com or by postal mail:

Air Cargo Green Capabilities

17, Boulevard Grande-Duchesse Charlotte, L-1331, Luxembourg

You have the right to lodge a formal complaint with the relevant Data Protection Authority (in Luxembourg, Commission Nationale pour la Protection des Données “CNPD”).

This Data Protection Notice may be modified to reflect changes on the Websites or on Air Cargo processing activities, to comply with legal amendments, or to integrate best practices. Updates of the Data Protection Notice will be published on Websites once available.

Data protection notice: business relationship

Air Cargo Green Capabilities Luxembourg Airport, Luxembourg (hereafter referred to as “**Air Cargo**” or “**We**”) is committed to protecting the personal data of our customers, prospects, suppliers, consultants, business partners and more generally, of any data subject concerned by our processing activities (hereafter referred to as “**You**”).

Air Cargo processes your personal data in the scope of our business relationship. This Data Protection Notice explains how we process your personal data, complying with the rules currently stated in the General Data Protection Regulation EU 2016/679 (hereafter referred to as the “**GDPR**”) on the protection of individuals with regards to the processing of personal data and on the free movement of such data.

Who is the controller of your personal data?

Air Cargo is responsible for collecting and processing your personal data in relation to the business and commercial relationship.

What personal data will Air Cargo process and why do we process it?

In the scope of the contractual and/or pre-contractual relationship with Air Cargo, we may process various types of personal data about You:

- Name, surname, and designation
- Job title and company or organization You are associated with
- Exercise of public and political offices as well as relevant links to political parties, governmental bodies or public entities
- Meeting records and communications between You and Air Cargo
- Answers and supporting documentation You provide to us through the Air Cargo vetting process, trainings, surveys and other forms and questionnaires
- Business contact details
- Your signatures in contracts and other relevant documentation
- Shipment information (booking history, details of transactions, purchase information, shipment description)
- Other information You choose to share with us.

Except for when proved impossible or involving a disproportionate effort, prior to providing Air Cargo with personal data of its current or former executives, directors, managers and employees; current or former subcontractors; contactable references; or any other natural persons, You shall ensure that any and all affected data subjects are informed of the Data Protection Notice, and that they have not objected to the processing of their Personal Data by Air Cargo.

When providing Air Cargo with special categories of Personal Data, You shall further ensure that the explicit consent of the data subjects have been obtained. Air Cargo is entitled to request, at any time, evidence of the consent granted.

How do we collect your personal data?

We may collect the categories of personal data mentioned above by various channels:

- We collect the personal data that You provide directly to us.
- We receive your personal data from our partners or other companies involved in the management of our business relationship with You.

- We retrieve information that may be accessible on administration databases that are publicly accessible.
- We may also receive personal data that You have made public on social media networks.

What are the purposes and the legal basis for Air Cargo's processing activities?

The information we request from You is considered as the minimum necessary data enabling Air Cargo to pursue the purposes described below:

- To provide You with our services, advice, or assistance and communicate with You for operational needs.
- To enter into a business relationship with Your company and execute day-to-day activities,
- To maintain up to date and accurate information in our Systems regarding You and Your company,
- To provide You trainings and documentation related to trainings when needed, To process your Company customer's application request.
- To process sales quotations and cargo consignment bookings for the company You represent.
- To respond to complaints, claims and requests.
- To defend ourselves in the case of litigation and investigations.

The legal basis for the processing of your personal data is **necessary for the performance a contract**, based on the performance of the General Terms and Conditions of Carriage executed between Air Cargo and the customer.

- To conduct background checks to fulfill applicable domestic and foreign legal and regulatory requirements including Know Your Customer (KYC) and Know Your Supplier (KYS), as well as internationally recognized CSR and ethical principles.
- To prevent conflicts of interest and confidentiality issues.
- To ensure compliance with national and international laws and regulations.
- To assess, accept or reject a shipment benchmarked against relevant legal, customs and regulatory requirements and our General Terms and Conditions of Carriage.

The legal basis for the processing of your personal data is **necessary for compliance with an applicable legal obligation**.

Who do we share your personal data with?

We may disclose your personal data:

- to members of Air Cargo on a need-to-know basis,
- to third parties providing services to us, namely, website hosting, IT services and other similar services to enable them to provide their services,

- to service providers which assist Air Cargo in the scope of conducting background checks,
- to representatives of Air Cargo and service providers at relevant Stations involved in the acceptance, transit or delivery of your shipment,
- to certain regulated professionals such as lawyers or auditors (if necessary to defend ourselves in the case of litigation and investigations),
- to issue invoices and other financial documentation,
- to other natural and legal persons, public and private, when communication is necessary or functional to carry out our activities,
- to third parties outside the Air Cargo group, if obliged by competent authorities as per the applicable laws.

How do we protect your personal data?

We have implemented technical and organizational security measures to protect your personal data from unauthorized access, improper use, alteration, unlawful or accidental destruction and loss.

Nevertheless, no data transmission or storage over the internet can be guaranteed to be 100% secured. If You feel that the security of any account You might have with us has been compromised, please immediately notify us of the problem by contacting us with the "Contacting Us" section below.

Where do we transfer your data to?

Your personal data are processed by us within the European Union.

In case of international transfers originating from the EU/EEA to a country outside the EU/EEA, the transfer of your personal data may occur where the European Commission has determined that the country outside the EU/EEA ensures an adequate level of data protection. For transfers to countries outside the EU/EEA for which the level of protection has not been recognized as adequate by the European Commission, Air Cargo will implement appropriate safeguards provided for by current data protection law (e.g. the entry into standard data protection clauses) or rely on a derogation applicable to specific situations.

For how long do we keep your data?

Air Cargo does not keep your personal data for any longer than is necessary. The duration of retention depends on the purposes for which data are processed as described below:

- Personal data processed in connection with a business relationship is erased 10 years from the end of the business relationship, unless longer statutory retention periods or limitation periods apply.

- Personal data processed of rejected business partners during a compliance verification will be erased 5 years from the conclusion of the due diligence process.
- Personal data processed in the scope that is necessary to comply with a legal or regulatory obligation will be kept for as long as required by applicable laws and regulations.

After this retention period, the data will be erased from Air Cargo's system.

What are your rights?

In accordance with the applicable data protection laws (and subject to conditions and restrictions set forth therein), You may exercise at any time the following rights in relation to your personal data:

- **Right of access**, which enables You to obtain from us confirmation of whether your personal data is being processed or not and, if so, obtain access to such data (considering we process a large quantity of information; when exercising your right of access You should specify the transaction, information or processing activities to which your request relates)
- **Right to rectification**, which enables You to obtain from us the correction and/or integration of any of your personal data that are incorrect and/or incomplete;
- **Right to erasure**, which enables You, in specific cases provided for by art. 17 GDPR, to obtain from us the erasure of your personal data;
- **Right to restriction of processing**, which enables You, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by us;
- **Right to object**, which enables You to object to the processing of your personal data when certain conditions are met;
- **Right to data portability**, which enables You, in certain cases (subject in particular to technical feasibility) and only with regard to the data You have provided to us, to request receipt of your personal data in a structured and commonly machine-readable format.

To exercise any of these rights, You may contact us by email sales@aircgc.com or by postal mail:

Air Cargo Green Capabilities

17, Boulevard Grande-Duchesse Charlotte, L-1331, Luxembourg

You have the right to lodge a formal complaint with the relevant Data Protection Authority (in Luxembourg, Commission Nationale pour la Protection des Données "CNPD").

This Data Protection Notice may be modified to reflect changes on the Website or on our processing activities, to comply with legal amendments, or to integrate best practices. Updates of the Data Protection Notice will be published on our Websites.

Data protection notice: video surveillance

Air Cargo Green Capabilities, Luxembourg Airport, Luxembourg (hereafter referred to as “**Air Cargo**” or “**we**”) is committed to the protection of your personal data in accordance with data protection legislation, especially the General Data Protection Regulation EU 2016/679 (the “**GDPR**”).

This Data Protection Notice is intended to inform Air Cargo employees, visitors of its buildings, infrastructure and site (“**You**”) on the use of a video-surveillance system (the “video-surveillance system”), how long we keep data, what rights You have and how You can exercise them.

WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

Air Cargo is responsible, as a data controller, for collecting and processing your personal data under the video-surveillance system, determining the purposes and means of such processing.

WHAT PERSONAL DATA DO WE PROCESS?

We collect and use your image when You enter or circulate in buildings or locations covered by our video-surveillance system (the “**premises**”). Pictograms are displayed at the entrance of, and around the premises. The data we collect include the following categories of data:

- images caught on cameras installed in monitored premises indicated by pictograms (no sound is recorded).
- dates and hours of recordings.

WHY DO WE PROCESS YOUR PERSONAL DATA (PURPOSE AND LEGAL BASIS)?

We collect and use your personal data for the following purposes:

- to control access to and to ensure the security of the premises, the safety of Air Cargo staff and visitors, as well as property, assets and information located or stored in the premises;
- to prevent, deter, and if necessary, investigate unauthorized access, including unauthorized access to secure premises and protected rooms, IT infrastructure, or operational information;
- to prevent, detect and investigate unauthorized or unacceptable behaviors, including potential criminal offences, such as theft of equipment or assets owned by Air Cargo, its customers, visitors or staff or threats to the safety of persons present in the premises (in case of, e.g. fire, accident or physical assault).

The video-surveillance system is not used for purposes that are incompatible with those detailed above.

Where allowed by law, the video-surveillance system may be used as an investigative tool or to obtain evidence in internal investigations or disciplinary procedures, including in case of a security incident.

We collect your personal data to comply with a legal obligation, namely Reg. (EU) 952/2013 laying down the Union's Customs Code and the European Commission Implementing Regulation (EU) 2015/2447.

Where applied to Air Cargo's staff, video-surveillance systems comply with article L. 261-1 of the Luxembourg Labor Code.

WHO CAN ACCESS YOUR PERSONAL DATA?

In order to fulfil the aforementioned purposes, your personal data can only be accessed by a limited number of staff from the Corporate Security Department, and restricted to individuals on a need-to-know basis for operational and maintenance purposes, as well as Air Cargo's external security provider in limited cases.

We may communicate your personal data to:

- service providers/vendors (such as a contracted security company) that perform services on our behalf,
- the Police, law enforcement or other government and regulatory bodies or agencies, upon request and to the extent permitted by law.

WHERE DO WE TRANSFER YOUR PERSONAL DATA?

Your personal data are processed by us within the European Union and no transfer of your personal data occurs outside of the European Union/European Economic Area (EU/EEA).

SECURITY OF YOUR PERSONAL DATA

The processing of your personal data is carried out through IT, electronic and manual tools, with logics strictly related to the aforementioned purposes and, in any event, in compliance with the appropriate technical and organizational measures required by law to ensure a level of security that is adequate to the risk, in order to avoid unauthorized loss of or access to your data.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your personal data for 21 days from their recording, except in the event of an incident, investigation or legal proceedings. At the end of that period your personal data will be deleted or destroyed.

WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

In accordance with applicable data protection law (and subject to conditions and restrictions set forth therein), You may exercise at any time your *right to access*, which enables You to obtain from us confirmation on whether your personal data are

being processed or not and, if so, obtain access to such data; we process a large quantity of information, and can thus request, in accordance with GDPR, that before the information is provided, You specify the transaction, information or processing activities to which your request relates.

In certain limited cases (in which case we will analyse whether the conditions for the exercise of such rights are fulfilled, in line with the GDPR), You may exercise the following rights in relation to your personal data:

- *right to erasure*: which enables You, in specific cases provided for by art. 17 GDPR, to obtain from us the erasure of your personal data;
- *right to restriction of processing*: which enables You, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by us;
- *right to object*: which enables You to object to the processing of your personal data when certain conditions are met.

To exercise any of these rights, You may contact us by email sales@aircgc.com or by postal mail:

Air Cargo Green Capabilities

17, Boulevard Grande-Duchesse Charlotte, L-1331, Luxembourg

You have the right to lodge a formal complaint with the [Commission nationale pour la protection des données](#).

CHANGES TO THIS DATA PROTECTION NOTICE FOR VIDEO-SURVEILLANCE

Changes may occur in the way we process personal data. In case these changes oblige us to update this Data Protection Notice for Video-surveillance, we will clearly communicate it to You, either via our website or via other appropriate means. The latest applicable version will always be available on our website.

Data protection notice: websites

Air Cargo Green Capabilities Luxembourg Airport, Luxembourg (hereafter referred to as “**Air Cargo**” or “**We**”) is committed to protecting the personal data of customers, prospects, users of our website and, more generally, of any data subject concerned by Air Cargo processing activities (hereafter referred to as “**You**”).

The management of “aircgc.com”, “www.aircgc.com” websites (hereinafter referred to as “**Websites**”) require the processing of personal data by Air Cargo. This Data Protection Notice explains how Air Cargo processes your personal data, complying with the rules currently stated in the General Data Protection Regulation EU 2016/679 (hereafter referred to as the “**GDPR**”) on the protection of individuals with regards to the processing of personal data and on the free movement of such data.

Where links to websites of other organizations are provided on Air Cargo Websites, this privacy notice does not cover how these organizations process personal data.

Who is the controller of your personal data?

Air Cargo is responsible for collecting and processing your personal data in relation to your use of the Websites.

What personal data will Air Cargo process and why do we process it?

When You use Air Cargo Websites, we may process the following types of personal data about You:

- Data relating to navigation on Websites
- Domain and host from which You access the internet
- Browser software and operating system of your computer
- The IP address of your computer
- The internet address of the site from which You linked directly to the Website
- Search queries and results

Other categories of personal data may be processed when You chose to identify yourself and provide data in order for Air Cargo to reply, follow-up and manage your requests:

- Name and surname
- Job title and Company location You are associated with
- Business email address
- Other information You choose to share with Air Cargo through remarks/comment boxes

How do we collect your personal data?

We may collect the categories of personal data mentioned above by various channels:

- When You provide data directly to Air Cargo via the online forms available on Websites or when You decide to contact Air Cargo via the contact email addresses available on our Websites.
- Through third-party service providers tasked with managing parts of Air Cargo Websites.
- Through the use of cookies or similar technologies (For more information, please read our Cookie Policy).

What are the purposes and the legal basis for Air Cargo's processing activities?

The information we request from You is considered as the minimum necessary data enabling Air Cargo to pursue the purposes described below:

- To generate audience and usage statistics of Websites and improve our online services.

- To manage the operation and security of Websites with event logging.
- To ensure the technical administration in connection with service providers (e.g. Third-party application maintenance, hosting, domain name registrar, certification, etc.).
- To provide and give You access to online services to which You have adhered to.
- To prepare and publish content and provide You with downloadable files on the Website (e.g. Conditions of Contract, Single Process Brochures, etc.).
- To guarantee the availability of online forms and Air Cargo contact details.
- To answer your questions.

The legal basis for the processing of your personal data is **legitimate interest**, to improve the Air Cargo Website user experience, to finetune Websites content according to usage.

The processing does not involve automated decision-making.

Who do we share your personal data with?

We may disclose your personal data:

- to members of Air Cargo and its subsidiaries on a need-to-know basis.
- to third parties providing services to Air Cargo, namely, website hosting, IT services and other similar services to enable them to provide their services.
- to other third parties, if obliged by competent authorities as per the applicable laws.

How do we protect your personal data?

We have implemented technical and organizational security measures to protect your personal data from unauthorized access, improper use, alteration, unlawful or accidental destruction and loss.

Nevertheless, no data transmission or storage over the internet can be guaranteed to be 100% secured. If You feel that the security of any account You might have with Air Cargo has been compromised, please immediately notify Air Cargo via the "Contacting Us" section below.

Where do we transfer your data to?

Your personal data are processed by Air Cargo within the European Union.

In case of international transfers originating from the EU/EEA to a country outside the EU/EEA, the transfer of your personal data may occur where the European Commission has determined that the country outside the EU/EEA ensures an adequate level of data protection. For transfers to countries outside the EU/EEA for which the level of protection has not been recognized as adequate by the European Commission, Air Cargo will implement appropriate safeguards provided for by current data protection law (e.g. the entry into standard data protection clauses) or rely on a derogation applicable to specific situations.

For how long do we keep your data?

Air Cargo does not keep your personal data for longer than what is necessary to achieve the purposes above. The duration of retention depends on the purposes for which data are processed as described below:

Data relating to cookies and website usage is stored in accordance with the information available in the Cookie Policy.

After this retention period, the data will be erased from Air Cargo's system.

What are your rights?

In accordance with the applicable data protection laws (and subject to conditions and restrictions set forth therein), You may exercise at any time the following rights in relation to your personal data:

- **Right of access**, which enables You to obtain from Air Cargo confirmation of whether your personal data is being processed or not and, if so, obtain access to such data (considering we process a large quantity of information; when exercising your right of access You should specify the transaction, information or processing activities to which your request relates);
- **Right to rectification**, which enables You to obtain from Air Cargo the correction and/or integration of any of your personal data that are incorrect and/or incomplete;
- **Right to erasure**, which enables You, in specific cases provided for by art. 17 GDPR, to obtain from Air Cargo the erasure of your personal data;
- **Right to restriction of processing**, which enables You, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by Air Cargo;
- **Right to object**, which enables You to object to the processing of your personal data when certain conditions are met;
- **Right to data portability**, which enables You, in certain cases (subject in particular to technical feasibility) and only with regard to the data You have provided to Air Cargo, to request receipt of your personal data in a structured and commonly machine-readable format.

To exercise any of these rights, You may contact Air Cargo by email sales@aircgc.com or by postal mail:

Air Cargo Green Capabilities

17, Boulevard Grande-Duchesse Charlotte, L-1331, Luxembourg

You have the right to lodge a formal complaint with the relevant Data Protection Authority (in Luxembourg, Commission Nationale pour la Protection des Données "CNPD").

This Data Protection Notice may be modified to reflect changes on the Websites or on Air Cargo processing activities, to comply with legal amendments, or to integrate

best practices. Updates of the Data Protection Notice will be published on Websites once available.

Data protection notice: Air Cargo Marketing & Communications

Air Cargo Green Capabilities Luxembourg Airport, Luxembourg (hereafter referred to as “**Air Cargo**” or “**We**”) is committed to protecting the personal data of our customers, prospects, and more generally, of any data subject concerned by our processing activities (hereafter referred to as “**You**”).

This Data Protection Notice explains how we process your personal data, complying with the rules currently stated in the General Data Protection Regulation EU 2016/679 (hereafter referred to as the “**GDPR**”) on the protection of individuals with regards to the processing of personal data and on the free movement of such data.

Who is the controller of your personal data?

Air Cargo is responsible for collecting and processing your personal data in relation to sending You marketing materials and communications.

What personal data will Air Cargo process and why do we process it?

We may process various types of personal data about You:

- Name, surname
- Username
- Job title and name of the company You are associated with
- Business email address

How do we collect your personal data?

We may collect the categories of personal data mentioned above by various channels:

- We collect the personal data that You provide directly to us.
- We may also receive information from social network that You have made public (e.g. LinkedIn).

What are the purposes and the legal basis for Air Cargo's processing activities?

The information we request from You is considered as the minimum necessary data enabling Air Cargo to pursue the purposes described below:

- To send You our Monthly Newsletter & share relevant market information with You.
- To connect and interact with You on social media or when You react to publications or comment boards of the newsletter to which You can post (Please note that information posted on these boards will be available to the public).

The legal basis for the processing of your personal data is **legitimate interest**, to perform email marketing, provide You with information on network developments, improvements to our services, fleet developments, updates on embargoes, customs requirements, fuel surcharges, as well as to perform market research.

If You have subscribed directly to the Monthly Newsletter on the Air Cargo Website, the legal basis for the processing of your personal data is **consent**. You can withdraw such consent at any time by contacting us directly.

If You do not want Air Cargo to process your personal data for the purpose of sending You marketing emails and newsletters, You have the possibility to opt-out by clicking the Unsubscribe button at the end of the email, or by contacting us directly.

Who do we share your personal data with?

We may disclose your personal data:

- to members of Air Cargo on a need-to-know basis.
- to third parties providing services to us, namely, website hosting, IT services and other similar services to enable them to provide their services.
- to third parties outside the Air Cargo group, if obliged by competent authorities as per the applicable laws.

How do we protect your personal data?

We have implemented technical and organizational security measures to protect your personal data from unauthorized access, improper use, alteration, unlawful or accidental destruction and loss.

Nevertheless, no data transmission or storage over the internet can be guaranteed to be 100% secured. If You feel that the security of any account You might have with us has been compromised, please immediately notify us of the problem by contacting us in accordance with the "Contacting Us" section below.

Where do we transfer your data to?

Your personal data are processed by us within the European Union.

In case of international transfers originating from the EU/EEA to a country outside the EU/EEA, the transfer of your personal data may occur where the European Commission has determined that the country outside the EU/EEA ensures an adequate level of data protection. For transfers to countries outside the EU/EEA for which the level of protection has not been recognized as adequate by the European Commission, Air Cargo will implement appropriate safeguards provided for by current data protection law (e.g. the entry into standard data protection clauses) or rely on a derogation applicable to specific situations.

For how long do we keep your data?

Air Cargo does not keep your personal data for any longer than is necessary. The duration of retention depends on the purposes for which data are processed as described below:

Data used for marketing purposes will be deleted as soon as no longer accurate or as soon as You exercise your rights as detailed below.

After this retention period, the data will be erased from Air Cargo's system.

What are your rights?

In accordance with the applicable data protection laws (and subject to conditions and restrictions set forth therein), You may exercise at any time the following rights in relation to your personal data:

- **Right of access**, which enables You to obtain from us confirmation of whether your personal data is being processed or not and, if so, obtain access to such data (considering we process a large quantity of information; when exercising your right of access You should specify the transaction, information or processing activities to which your request relates)
- **Right to rectification**, which enables You to obtain from us the correction and/or integration of any of your personal data that are incorrect and/or incomplete;
- **Right to erasure**, which enables You, in specific cases provided for by art. 17 GDPR, to obtain from us the erasure of your personal data;
- **Right to restriction of processing**, which enables You, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by us;
- **Right to object**, which enables You to object to the processing of your personal data when certain conditions are met;
- **Right to data portability**, which enables You, in certain cases (subject in particular to technical feasibility) and only with regard to the data You have provided to us, to request receipt of your personal data in a structured and commonly machine-readable format.

If You have provided your consent to the processing of your personal data, You can withdraw such consent at any time.

If You no longer want to receive our newsletter and related marketing materials, please use the Unsubscribe option in the mailings.

To exercise any of these rights, You may contact us by email sales@aircgc.com or by postal mail:

Air Cargo Green Capabilities**17, Boulevard Grande-Duchesse Charlotte, L-1331, Luxembourg**

You have the right to lodge a formal complaint with the relevant Data Protection Authority (in Luxembourg, Commission Nationale pour la Protection des Données “CNPD”).

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