

# NDC PARTNER PROGRAM

## Data Protection Declaration

### 1 DATA CONTROLLER

In the following, we, Deutsche Lufthansa (Venloer Straße 151-153, 50672 Köln, Deutschland), inform you about the processing of your personal data in the course of your use of our website [www.lhgroupairlines.com/ndc](http://www.lhgroupairlines.com/ndc) (Lufthansa Group Airlines NDC Partner Program).

In the following, Lufthansa Group Airlines refers to the airlines Lufthansa, SWISS International Airlines AG, Austrian Airlines AG, and Brussels Airlines N.V. The Lufthansa Group includes Lufthansa Group Airlines as well as the other companies of the Lufthansa corporation.

Our website may contain links to the websites of other providers that do not observe this data protection policy. If you have any further questions regarding data protection in connection with our website or the services offered on it, and then please contact our data protection officer:

Lufthansa Group Data Protection Officer  
Deutsche Lufthansa AG  
E-Mail: [datenschutz@dlh.de](mailto:datenschutz@dlh.de)

If you contact us by e-mail, communication is unencrypted.

### 2 SCOPE, PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

In the following situations, we will collect and use personal data directly from our users or from other sources (as explained below):

#### 2.1 Hosting of the website and creation of log files

When users visit our website, our system automatically records data and information from the computer system of the visiting computer upon each visit. The following data is collected (“technical information”):

- (1) Information about the browser type and version used
- (2) Operating system of the user
- (3) Date and time of access

- (4) Websites from which the user's system accessed our website
- (5) Websites that are accessed by the user's system from our website

The data is also saved in the log files of our system. This does not include the IP addresses of the user or other data that would allow association of the data to a user. This data is not saved along with the user's other personal data.

## 2.2 Purpose of processing

We collect and use this technical information for the purposes of (network) security (for example, in order to be able to combat cyber-attacks) and marketing, and in order to be able to understand the needs of our users better, also to make continuous improvements to our website and enable users to access the website on their computers.

## 2.3 The legal basis

The legal basis for the temporary storage of data is Art. 6 (1) f) of the General Data Protection Regulation (GDPR). We process personal data in order to fulfil our contractual obligations under Art. 6 (1) subpara. 1 b) GDPR. In particular, this includes:

- issuing an access and content agreement for the NDC API of the LHG

We also process your data to safeguard our legitimate interests under Art. 6 (1) subpara. 1 f) GDPR

- in order to provide you with relevant information about your LHG NDC API
- for auditing purposes
- to guarantee IT security and the IT operations of the airline
- for the purposes of producing statistics on international air traffic

We process your data based on your consent under Art. 6 (1) subpara.1 a) GDPR for specific purposes, in particular:

- to distribute the newsletter for our Lufthansa Group NDC Partner Program
- to send you special information and offers from Lufthansa and its partner companies
- for market research and customer surveys
- for analytical purposes in order to optimize our offer for you.

## 2.4 Use of cookies

Our website uses cookies. Cookies are text files that are saved onto the user's computer system in and by the internet browser. When a user accesses a website, a cookie may be saved on the user's operating system. This cookie contains a characteristic string of characters that allows a unique identification of the browser upon subsequent access of the website. Cookies are saved on the user's computer and are transmitted to us by the computer. Therefore, you as the user have full control over the use of cookies. By changing the settings in your internet browser, you can deactivate or limit the transmission of cookies. Cookies that have already been saved can be deleted at any time. This can also be implemented automatically. If cookies are deactivated for our website, it is likely that not all functions of the website will be fully available to you. You can

find more information about the cookies we use, their purpose, and the legal basis/bases for them in our [Cookie Policy](#).

## 2.5 Tracking-tools

On our website, we use the following tracking and (re)marketing tools:

- E-Tracker

The legal basis for the use of the tools listed is our legitimate interest in accordance with Art. 6 para. 1 (f) of the GDPR for the purposes of increasing the efficiency of our website and (direct) marketing.

The provider of this website uses the services of eTracker GmbH in Hamburg, Germany (<https://www.etracker.com>) for the analysis of usage data. Cookies are used in order to enable a Statistical analysis of the usage of this website by its visitors, as well as to display contents or Advertisements based on usage. Cookies are small text files that are saved onto the end device of the user by the internet browser. eTracker cookies do not contain any information that would allow the identification of a user.

The data produced with eTracker is processed and saved by eTracker exclusively in Germany on behalf of the provider of this website and is subject to the strict German and European data protection laws and standards. eTracker was independently reviewed, certified, and awarded the data protection quality seal (<https://www.eprivacy.eu/kunden/vergebene-siegel/firma/etracker-gmbh/>) for this.

Data processing is carried out on the legal basis of Art. 6 (1) f) (legitimate interest) of the EU General Data Protection Regulation (EU GDPR). Our legitimate interest lies in the optimisation of our online services and internet presence. Because the privacy of our visitors is of the utmost importance to us, the IP address is anonymized as soon as possible in eTracker, and login or device recognitions in eTracker are converted into a unique key that is not assigned to an individual. There is no other use, compilation with other data, or forwarding to third parties by eTracker.

Click for further information about data protection and eTracker:

<https://www.etracker.com/en/dataprivacy/>

## 2.6 Obligation to disclose personal data

For legally stipulated or contractual requirements, we have marked on our website forms the input fields that you are required to fill in so that we can provide you with the desired contract or service. Beyond this, personal data is only processed if you provide us with it, of your own accord, in order to implement the Lufthansa Group Airlines NDC Partner Program.

## 3 RIGHTS OF DATA SUBJECTS

It is very important to us at Deutsche Lufthansa AG that our processing methods are fair and transparent. Therefore, in addition to the right of appeal, we aim to ensure that data subjects can exercise the following rights, under the necessary legal preconditions:

- Right to information, Art. 15 of the GDPR
- Right to rectification, Art. 16 of the GDPR
- Right to erasure (“Right to be forgotten”), Art. 17 of the GDPR
- Right to restrict processing, Art. 18 of the GDPR
- Right to data portability, Art. 20 of the GDPR

If you have given us your consent to process your personal data, we would like to point out that you can revoke this consent at any time.

To exercise your rights, you can contact [datenauskunft@dlh.de](mailto:datenauskunft@dlh.de) by email. Around to be able to process your application and for identification purposes, we point out that we will process your personal data in accordance with Art. 6 Para. 1 lit. c GDPR. You also have the right to lodge a complaint with a supervisory authority.

## 4 DISCLAIMER AND LIMITS OF THESE DATA PROTECTION GUIDELINES

These data protection guidelines pertain only to the processing that takes place on the website <https://lhgroupairlines.com/ndc/>; our website may contain links to websites of other providers. Other websites are not subject to these data protection guidelines and may provide their own specific data protection guidelines. Annex – Notes on tracking and remarketing tools used  
Lufthansa uses remarketing services to advertise to you on third-party websites after you have visited our service. We, and our third-party vendors, use cookies to inform, optimize, and serve ads based on your past visits to our service.