

PRIVACY POLICY

EnvyJet Sarl (We, EnvyJet, our or us) are committed to protecting your (you or your) personal data, handling it responsibly and respecting your privacy.

This policy covers the personal data that we collect whenever you interact with us, including when you use [our website](#) and [apps](#), when you attend EnvyJet events, and when you correspond with us (such as by email or over the phone). It also covers personal data that we may receive from third parties.

The sections below explain in more detail:

- The types of personal data we collect from you
- The types of personal data we receive from third parties
- Why we process your personal data
- Who we share your personal data with
- Personal data transfers outside of the EEA
- How long we retain your personal data and security
- Your rights to withdraw your consent and to object (including to direct marketing)
- Your other personal data rights
- How to contact us and exercise your rights

If you would like to know how we collect information about your use of our websites, apps and social media sites, you can read our [Other Information Collection Policy here](#).

PERSONAL DATA FLY ENVYJET COLLECTS FROM YOU

We collect personal data from your interactions with us, such as when you engage with our websites and apps, attend a Fly EnvyJet event, or when you email or phone us.

The personal data we collect from you includes:

- The name and contact details that you provide at the time of making an enquiry, when you register as a member with us and complete forms on our site [EnvyJet.com](#), (our site)
- Your payment and address details
- Your marketing preferences, including any consents you have given us
- Information you provide when you complete surveys that we use for research purposes
- Your browser or device information

- Information about your use of our websites and apps
- Your communications with us, including when you report a problem with our site
- Information about your invitations and attendance at Fly EnvyJet events.

PERSONAL DATA FLY ENVYJET RECEIVES FROM THIRD PARTIES

Sometimes we receive personal data from third parties, in particular:

- You may have asked someone to book or to make an enquiry on your behalf
- Software tell us how you engage with our websites and apps
- Data specialists provide us with insights about our members, based on their own aggregated data sets
- Government and law enforcement authorities may provide us with personal identification and background information when they are involved in official inquiries

WHY FLY ENVYJET PROCESSES YOUR PERSONAL DATA

This section explains the reasons why we process your personal data and our legal bases for doing so.

CONSENT

If you've opted-in to receive information and offers relating to Fly EnvyJet and our commercial partners (for example by ticking a box on one of our websites or apps), then we'll provide this information to you by email, post, app notification, or phone. [Click here for a list of our current partners.](#)

We also rely on your consent to process information about your use of our websites, apps and social media sites, so that we can improve your browsing experience and deliver online advertising that is relevant to you (for more information, click here to see our [Other Information Collection Policy here](#) and [Marketing Communications Policy](#)).

Wherever we rely on your consent to process personal data, you have a right to withdraw that consent. [Click here for information on how to contact us and exercise your rights.](#)

LEGITIMATE INTERESTS

We process your personal data when necessary to pursue our legitimate interests in the following:

- tailoring our website and communications for you. We collect information about your engagement with us online (such as pages that you have visited on our websites or

apps) and combine that with aggregated insights we have about our member base, to build a fuller understanding of your individual preferences

- carrying out profiling to tailor our marketing information which is most relevant and appropriate to you
- monitoring, improving and protecting our products, content and services
- checking the credit or debit card details you provide (to process your payments and prevent fraudulent transactions)
- sending you some types of direct marketing, including by email and post
- responding to your comments or complaints
- undertaking, or inviting you to take part in, market research
- querying whether you have had an issue completing an online form
- preventing, investigating and/or reporting fraud, terrorism, misrepresentation, security incidents or crime
- managing legal claims, compliance, regulatory and investigative matters
- notifying you about changes to our service

You have a right to object to any processing that we undertake for our legitimate interests. [Click here for information on how to contact us and exercise your rights.](#)

CONTRACT

We process your personal data when necessary for contractual reasons, such as to administer your account registration and to provide products and services that you have requested.

LEGAL OBLIGATION

We are legally required to process your personal data in cases where we need to respond to certain requests by government or law enforcement authorities.

WHO FLY ENVYJET SHARES PERSONAL DATA WITH

We will share your personal data with the following recipients:

- commercial partners, so they can advise us how best to communicate with you on their behalf. We do not give your data to partners for them to communicate with you directly. [Click here for a list of our current partners.](#)
- third party suppliers involved in: data insights; website hosting; advertising; systems maintenance; database management; identity checking; payment processing; delivery logistics;

- government authorities to assist with their official requests and comply with our legal obligations
- our advisers, any prospective booker's advisers, and any new owners of the business (in the event our business is sold or integrated with another business)

PERSONAL DATA TRANSFERS OUTSIDE OF THE EEA

The EEA includes all EU countries, as well as Iceland, Liechtenstein and Norway. Some of the third parties that we share personal data with may need to transfer personal data outside of the EEA, for example to the United States of America. [Click here](#) to see a list of the third parties we share personal data with.

Where your personal data is transferred to a country outside of the EEA and that country is not subject to an EU adequacy decision, we will ensure your data is protected by appropriate safeguards (for example, EU approved standard contractual clauses, a Privacy Shield certification, or a supplier's Binding Corporate Rules). A copy of the relevant safeguard can be provided for your review on request - [Click here for information on how to contact us and exercise your rights](#).

HOW LONG FLY ENVYJET RETAINS PERSONAL DATA AND SECURITY

We retain personal data about your membership for as long as your account remains active, and for 5 years after (in case you decide to reactivate your membership or have queries about it).

We retain personal data relating to your bookings for 5 years from the date of the relevant transaction. This is to understand your booking preferences and to meet our legal and contractual obligations.

Where you have asked us not to send you direct marketing, we keep a record of that fact to ensure we respect your request in future.

We also retain information with the potential to give rise to legal disputes for 7 years from the expiry or termination of any contracts.

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, 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. [Click here for information on how to contact us and exercise your rights](#).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights to withdraw consent and to object (including to direct marketing)

Wherever we rely on your consent to process personal data, you always have a right to withdraw that consent. [Click here to see the situations where we rely on your consent.](#)

You also have the right to object to any use of your personal data for direct marketing purposes, as well as to processing that we undertake based on our legitimate interests. [Click here to see the situations where we process data for our legitimate interests.](#)

YOUR OTHER PERSONAL DATA RIGHTS

In addition to your rights to withdraw your consent and to object, you have the right to ask us:

- for access to information about your personal data or for a copy of your personal data
- to correct or delete your personal data
- to restrict (i.e. stop any active) processing of your personal data
- to provide you with certain personal data in a structured, machine readable format and to transmit that data to another organisation

These rights may not always apply, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have a compelling legitimate interest in keeping. If this is the case then we'll let you know when we respond to your request.

HOW TO CONTACT US AND EXERCISE YOUR RIGHTS

The easiest way to stop receiving information from us is by opting out of communications through your online account (this is linked to in our communications with you and is accessible at times via your account settings). You can also correct your registration details through your online account.

We will do our best to assist with any queries you have about your personal data. We will do our best to assist with any queries you have about your personal data. You can email privacy@envyjet.com at any time to remove your details. When you do so, please provide your full name, your preferred contact information, and a summary of your query.

If you consider our use of your personal information to be unlawful, you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred. This is likely to be the Information Commissioner's Office in the UK (please see further information on their website: www.ico.org.uk).

The information set out in this policy is provided to individuals whose personal data we process as data controller, in compliance with our obligations under Articles 13 and 14 of the General Data Protection Regulation 2016/679.

Last updated December 2020

We suggest that you check back here for updates, as we will update this policy from time to time.