



# Privacy Policy

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## Our privacy promise

Jambojet Ltd is committed to respecting your privacy and protecting your personal information.

We will be transparent about the information we are collecting and what we will do with it.

We will use the information you give us for the purposes described in our Privacy Policy, which include providing you with services you have requested and enhancing your experience with Jambojet Ltd.

We will also use the information to help us understand you better and so that we can give you relevant offers.

If you tell us you don't want to receive marketing messages we will stop sending them. We will, of course, continue to send important information relating to a product or service you have purchased to keep you informed about your booking and travel itinerary.

We will put in place measures to protect your information and keep it secure.

We will respect your data protection rights and aim to give you control over your own information.

You can access our full Privacy Policy below to help you to understand better how we use your personal information. In it, we explain in more detail the types of personal information we collect, how we collect it, what we may use it for and who we may share it with.

Within the Privacy Policy you will find some specific examples of why and how we use your personal information. If you have further questions please get in touch with us by writing to Data Protection Officer, Jambojet Ltd, Airport North Road, PO BOX 19079 – 00501, Nairobi, Kenya.

Without prejudice to your rights under applicable laws, the above and the Privacy Policy are not contractual and do not form part of your contract with us.

## **Full Privacy Policy Controller of Personal Information**

Any personal information processed by Jambojet Ltd in connection with this Privacy Policy is controlled by Jambojet Ltd, which is considered the “data controller” of your personal information under Regulation (EU) 2016/679 of The European Parliament. Our address is Data Protection Officer, Jambojet Ltd, Airport North Road, PO BOX 19079 – 00501, Nairobi, Kenya.

If you have made a flight booking with us but one or more flights are to be provided by other airline(s) then that other airline will also separately be considered a “data controller” under European data protection law.

Any provider of services such as a hotel or car rental company will also separately be a “data controller”. You can access the privacy policies of those providers from them directly.

If you have made a booking for non-flights services or booked a “package” then the package booking Terms and Conditions identify if your contract is with the Holiday Company instead of Jambojet Ltd who will also separately be a “data controller”.

### **What do we mean by personal information?**

Personal information means details which identify you or could be used to identify you, such as your name and contact details, your travel arrangements and purchase history. It may also include information about how you use our websites and mobile applications.

### **When does this policy apply?**

This Privacy Policy applies to personal information about you that we collect, use and otherwise process regarding your relationship with us as a customer or potential customer, including when you travel with us or use our other services, use our websites or mobile applications, contact our service agents or call centres and book to use our services through third parties (such as travel agents and other airlines).

Where we reference that others are data controllers in the sections ‘Controller of Personal Information’ and ‘Who do we share your personal information with?’ you should consult their privacy policies for further information.

Additional Terms and Conditions or policies may apply if you elect to take additional services from us such as making a duty free purchase on board, using our on-board Wi-Fi or entering a competition linked to Jambojet Ltd and other third parties.

## **How can you keep your personal information secure?**

We take great care to protect the personal information you provide to us. You can read more about how we do this in our website security policy. Here are some things you can do to keep your information secure.

### **Keep your booking reference confidential**

When you make a booking, you will be given a booking reference (also known as a PNR or Passenger Name Record). This will appear on the email confirmation or ticket of each person in your booking. You should keep your booking reference confidential always.

Giving your booking reference to others may allow them to access your booking details through our system.

If you are travelling with others and would not like your individual booking details to be accessible by them, you may prefer each person to make separate bookings.

Keep your booking reference number/jambojet.com registered customer log-in details confidential.

To make sure your access to our websites, other online services, and mobile applications is secure, you should not share your log in details with anyone else. When you finish using the website, online services or mobile app you should log out if others may be able to access your computer or device. This is especially important if you are using a publicly accessible computer.

### **Be aware of and protect yourself against Internet fraud and 'phishing'**

There is an Internet fraud practice known as 'phishing' which is the illegal gathering of personal information by deception. Unsolicited emails are sent to individuals from lists illegally gathered by a third party, and recipients are asked to enter or reconfirm bank or password details into a 'cloned' or illegal copy website.

### **When do we collect personal information about you?**

We collect personal information about you whenever you use our services (whether these services are provided by us or by other companies or agents acting on our behalf), including when you

travel with us, when you use our website or mobile applications, or interact with us via email or use our contact centres.

For additional details see 'What types of personal information do we collect and retain?' below.

In addition, we may receive personal information about you from third parties.

## **Companies contracted by us to provide services to you.**

Companies involved in your travel plans, including airlines involved in your prior or onward journey, relevant airport operators and customs and immigration authorities.

Companies that participate in our loyalty schemes and other customer programmes (e.g. car hire providers and hotels).

Companies who provide details to us under privacy policies providing information to be shared with Jambojet Ltd.

## **What types of personal information do we collect and retain?**

When you use our services, you will need to provide us with your personal details or the details of those individual(s) who will be travelling.

## **We collect the following categories of personal information:**

Information you provide for Jambojet Ltd to complete and manage a booking you have made with us or a service you have requested from us. **E.g. name, email, phone number, passport or national ID number etc.**

Information collected during your travel with us. **E.g. name, email, phone number, passport or national ID number etc.**

Information about your travel arrangements. **E.g. origin, destination, destination phone number etc.**

Information about the services we have provided to you in the past. **E.g. Past bookings, phone number, name of passenger, email etc.**

Information about online registration and other interactions. **E.g. Facebook name, Facebook associated email address, phone number etc.**

Information about your use of our websites, contact centres and mobile applications. For more details of the methods please see **E.g. name, email, and phone number**.

'How we use cookies and other methods for the collection of website usage data', below.

Information about your location from your device if you have been browsing on Jambojet Ltd or using our mobile application. (This is your IP address. An IP address (i.e. Internet Protocol address) is a numeric code that can act as a unique identifier for your computer or other device.

## When and why do we collect 'sensitive personal data'?

Certain categories of personal information, such as that about race, ethnicity, religion, health, sexuality or biometric information are special categories of data requiring additional protection under European Union data protection law and is referred to here as "sensitive personal data". Generally, we try to limit the circumstances where we collect and process sensitive personal data. Examples of where we may collect and process 'sensitive personal data' includes the following:

You have requested specific medical assistance from us and/or an airport operator, such as the provision of wheelchair assistance or oxygen.

You have sought clearance from us to fly with a medical condition or because you are more than 28 weeks pregnant.

You have otherwise chosen to provide such information to us or it has been passed onto us by a third party such as the travel agent through which you made your booking.

Biometric information (for example, facial recognition) may be collected during the security clearance process prior to, and after, flying with us.

In addition, you may have requested services (such as a meal) which is not 'sensitive data' but may imply or suggest your religion, health or other information.

## What do we use your personal information for?

The main purposes for which we use your personal information are:

To fulfil your travel arrangements and deliver the services you have asked for. **E.g. name, email, phone number, passport or national ID number etc.**

To manage the boarding process and to facilitate flight connections at the airport. **E.g. name, email, phone number, passport or national ID number etc.**

To send status updates and service communications to you. **E.g. name, email, phone number etc.**

To keep track of you in advance of your flight and at the airport. **E.g. name, email, phone number, passport or national ID number etc.**

To help keep you safe when you fly with us and to meet certain legal and regulatory requirements which apply to Jambojet Ltd as an airline. **E.g. name, email, phone number, passport or national ID number etc.**

To provide services tailored to your requirements and to treat you in a more personal way. **E.g. name, email, phone number, passport or national ID number etc.**

To carry out analysis and market research. **E.g. name, email, phone number.**

To carry out marketing and keep you informed of Jambojet Ltd' products and services. **E.g. name, email.**

To send you status updates and service communications. **E.g. name, email, phone number.**

To improve our websites, products and services. **E.g. name, email.**

For management and administrative purposes. **E.g. name, email, phone number.**

## **When will we send you marketing?**

When we collect information directly from you we may ask you if you do not want to receive our marketing communications. Please be aware that we do sometimes send marketing communications that promote a third party's products and services (for example, those of our business partners) as well as our own.

We may ask if you consent to receiving marketing communications from other members of our group or from third parties.

We will respect your choice as to what communications you wish to receive and the methods by which you are sent them.

How can you change what marketing communications you receive and how you receive them?

If you decide you would no longer like to be sent marketing communications, you can change your mind at any time. The ways to stop being sent marketing communications are described below:

If you are a registered user of Jambojet Ltd, you can change your marketing preferences at any time by amending your profile online.

In addition, each marketing communication we send by email will also have an unsubscribe option which will allow you to stop you receiving further marketing emails. You may also stop any further text messages by replying with the word "STOP". We aim to action requests to stop being sent

marketing communications within 10 working days of receiving those requests, but it is possible you will receive some marketing in the period prior to that change being made.

Please note that if you tell us that you do not wish to be sent further marketing communications, you will still receive service communications (as described above) which are necessary, for example, to confirm your booking or to provide you with an update on its status.

If you ask us to stop sending marketing communications, please note we will retain your personal information for the purposes of indicating that you do not want to receive marketing communications.

## **What is our legal basis for using your personal information?**

Jambojet Ltd will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason or reasons Jambojet Ltd collected and needs to use your information. Under EU data protection laws in almost all cases the legal basis will be:

Because we need to use your information so that we can process your booking, fulfil your travel arrangements and otherwise perform the contract we have with you.

Because it is in Jambojet Ltd.'s legitimate interests as an airline to use your personal information to operate and improve our business as an airline and travel provider.

Because Jambojet Ltd needs to use your personal information to comply with a legal obligation. To protect the vital interests of you or another person.

Because you have consented to Jambojet Ltd using your information for a particular purpose. More information on each legal basis is provided below.

If processing of your data is subject to any other laws then the basis of processing your data may be different to that set out above and may in those circumstances be based on your consent in all cases.

## **How long do we keep personal information?**

We will keep your information for as long as we need it for the purpose it is being processed for. For example, where you book a flight with us we will keep the information related to your booking, so we can fulfil the specific travel arrangements you have made and after that, we will keep the information for a period which enables us to handle or respond to any complaints, queries or concerns relating to the booking. The information may also be retained so that we can continue

to improve your experience with us and to ensure that you receive any loyalty rewards which are due to you.

We will actively review the information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or customer need for it to be retained.

## **Performance of a contract with you**

It will be necessary for Jambojet Ltd to use your personal information to complete a booking you have made with us. For example, we will need to use information such as your contact details and payment information to provide you with the flight, holiday and/or car hire you have requested and paid for.

## **Legitimate Interests**

As a commercial airline and travel provider Jambojet Ltd has a legitimate business interest to use the personal information we collect to offer an effective service and carry out our business.

## **Compliance with legal obligations**

There are situations where Jambojet Ltd is subject to a legal obligation and needs to use your personal information to comply with those obligations.

## **To protect the vital interest of you or another person**

There are situations where we may need to use your personal information to protect the vital interests of you or another person.

## **Consent**

Alternatively, we may collect and use your personal information where you have given your specific consent to us doing so.

If the basis of our processing your data is consent, you can withdraw your consent to such processing at any time, including by amending your profile online or telephoning.

However, if you withdraw this consent, in some circumstances, it may mean we will not be able to provide all or parts of the services you have requested from us and you will not be able to cancel your booking or obtain a refund of any charges you have paid.

## Who do we share your personal information with?

Your personal information may be shared with the companies within our group, which includes Kenya Airways, Matchbyte Consultants PTY Ltd, Salescycle Ltd, Mailchimp and WPP ScanGroup. We share information with them, so they can assist us in providing services to you and to understand more about you. For example, we may use this information to understand more about the sorts of travel services you are likely to be interested in.

You will only be sent marketing emails from other companies within our group where you have provided your consent to those companies.

We may also disclose your personal information to the following third parties for the purpose described here:

Customs and immigration authorities of any country in your itinerary or to which your flight may fly over. Jambojet Ltd and other airlines are required by law to give border control/immigration agencies and customs authorities access to booking and travel information when you fly to and from countries including stop-overs and where you may overfly countries to your destination.

Airlines and other service providers needed to deliver the services you have asked for where, for instance, part of your travel itinerary involves a flight operated by a different airline or includes car hire or a hotel booking. Those airlines and other service providers will be identified when you make a booking.

Credit and charge card companies, credit reference agencies and anti-fraud screening service providers to process payments and (where necessary) to carry out fraud-screening. In response to a valid, legal request from Government and law enforcement agencies such as customs and immigration authorities.

Third party service providers we are using to provide services that involve data processing, for example, to carry out marketing initiatives or run customer surveys on our behalf. Third parties, such as law firms and law courts, to enforce or apply any contract with you.

Third parties, such as the police and regulatory authorities, to protect our rights, property, or the safety of our customers, staff and assets.

We may provide usage information (but not your personal details) to other websites so that they know that you have visited our websites (see 'How we use cookies and other methods for the collection of website usage data' above).

If necessary to comply with a legal or regulatory obligation in any jurisdiction, including where that obligation arises because of a voluntary act or decision by us (e.g. our decision to operate to a country or a related decision).

If your booking of a package of a flight and other services (such as hotels) is with Jambojet Ltd Holidays (or they are partners providing parts of your package) as set out in Jambojet Ltd Holidays Terms and Conditions, your personal information is provided to both Jambojet Ltd and Jambojet Ltd Holidays.

We do not sell personal information to third parties, and we only allow third parties to send you marketing information where we have your consent to do so.

## **What countries will your personal information be sent to?**

Your personal information may be sent to and stored by us and third parties in countries outside the country in which you are located and outside the European Economic Area.

The nature of our business means it is often necessary for us to send your personal information outside the European Economic Area to fulfil your travel arrangements. This occurs because our business and the third parties identified in 'Who do we share your personal information with?' have operations in countries across the world. For example, where you are flying outside of the European Economic Area, your personal information will be transferred to border control and immigration outside of these territories.

In addition, we may transfer your data to parties in countries outside the country in which you are located to provide services to us.

This may involve sending your data to countries where under their local laws you may have fewer legal rights.

## **Requesting a copy of your personal information**

Under the EU Data Protection Regulation (GDPR), you may request a copy of any personal data about you held by Jambojet Ltd Plc. There is no fee for this request.

The request must be in writing and must contain the following:

Your name and postal address.

Details of your request.

Any details which may help us locate the information which is the subject of your request, for example:

Booking reference or flight numbers and dates.

Telephone recording details (identifier number, the number you call from, the number and option you dialled, the date and time of your call(s)).

## **You must also provide:**

A photocopy of your passport or driving licence, so that we can verify your identity.

Your signature and the date of the request.

If you are applying on behalf of another person then signed authority from the individual is required. Please send your request to:

Data Protection Manager Jambojet Ltd Plc

Airport North Road,

P.O. Box 19079 – 00501, Nairobi, Kenya.