

# Privacy & Cookies Policy

We view data privacy as a fundamental component of doing business. Our Privacy Statement and practices are focused on processing personal data appropriately and lawfully, while providing confidentiality, integrity and availability.

## 1. DEFINITIONS

“Personal Data” refers to any information that directly or indirectly identifies a natural person, including name, identification number, address, location, online identification, etc.

“Processing of Personal Data” encompasses various operations performed on Personal Data, whether automated or not, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, transmission by disclosure, dissemination, rendering, alignment, combination, blocking, erasure, or destruction.

“Jet Delayed” denotes J.D.L Jet Delayed Limited, a company duly incorporated under the laws of the Republic of Cyprus with Company No. 449734. having its registered address at Theseos 7, 2042, Strovolos, Nicosia, Cyprus.

## 2. PURPOSES FOR PROCESSING YOUR PERSONAL DATA

The purposes for processing your name, national identification number, date of birth, nationality, gender, address, place and country of residence, passport details, flight details, banking details and email are:

- a. to claim and receive on your behalf amounts, due by airlines as a result of the Flight Disruption that you experienced;
- b. to transfer to you the amounts that we received on your behalf;
- c. accountancy purposes;
- d. marketing;
- e. statistics, company organization and administration, and the improvement of Jet Delayed’s services.

The purpose for processing any email, password and account information is to maintain your user account.

The purpose for processing data stored in cookies is to make the use of our website much easier for you. For more information, please see our Cookies section.

## 3. LEGAL BASIS AND RULES FOR THE PROCESSING OF PERSONAL DATA

Jet Delayed processes Personal Data only in the instances in which the Client has given explicit consent and on the basis of imperative legal obligations.

The processing of Personal Data is carried out in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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) and the law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018) including all subsequent amendments.

The processing of Personal Data is carried out in accordance with the principle of transparency. This is your Data and you have a right to know how and for what reason it is used.

Jet Delayed does not collect or process more Personal Data than necessary for the successful delivery of the company’s services and the claiming of your compensation.

Personal Data is processed with robust technical and organisational security measures, guaranteeing a high level of protection against data loss and unlawful or unauthorised use. Access to Personal Data is limited to Jet Delayed’s team and relevant Third Parties required for successful compensation claiming. In case the provided Personal Data is incorrect or incomplete, Jet Delayed adopts the measures appropriate for the rectification or erasure of the Data whenever such measures are necessary.

In line with the principle of accountability, Jet Delayed Limited will always demonstrate compliance with the standard of data protection enshrined in the Privacy Policy and the General Data Protection Regulation.

Jet Delayed’s legal team is responsible for the correct application of the Privacy Policy as well as for its compliance with the General Data Protection Regulation.

## 4. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

We may send your Personal Data to airlines, alternative dispute resolution bodies, administrative bodies (such as national enforcement bodies), courts and other entities which Jet Delayed works with to perform its obligations under the Agreement with the Client (e.g. lawyers and law firms), or cooperates. For information about the recipients of data stored in cookies, please see our Cookies section.

In case we need to send your Personal data to third parties, they can process this information only to the extent of the purposes of the Agreement with the Client and cannot use it for their own marketing or other reasons.

Transfer of Personal Data to third parties is restricted to specific situations, including a valid Agreement with the Client, imperative legal obligations or requirements, the necessity for Jet Delayed to safeguard its rights and take action against the Client in the event of failure to fulfil contractual obligations. Jet Delayed uses the services of its IT partners to ensure the appropriate standard in the storage of your Personal Data.

## 5. TRANSFER OF PERSONAL DATA TO COUNTRIES THAT ARE NOT MEMBER STATES OF THE EU/EEA

Your Personal Data may be transferred to a non-European Union or European Economic Area (EEA) country if required for our services under the Agreement. In such cases, if the country lacks an adequacy decision from the European Commission or appropriate safeguards, potential risks to your Personal Data include loss, unauthorised access, alteration, dissemination or unlawful processing.

Jet delayed may transfer Personal Data to other countries only when necessary for fulfilling the Agreement with the client, such as when the airline is responsible for compensation is based in a different country.

## 6. DURATION OF PERSONAL DATA STORAGE

We will store your Personal Data for a period of 5 years from last time you accessed your account.

If you use the services of [www.jetdelayed.com](http://www.jetdelayed.com) to check whether you are entitled to compensation for a particular flight, the information you have submitted will be stored and processed in anonymised form and may be used only for statistical purposes and for the analysis of Jet Delayed’s performance.

## 7. RIGHT OF ACCESS, RECTIFICATION, ERASURE, RESTRICTION, OBJECTION, PORTABILITY WITH REGARDS TO PERSONAL DATA AND WITHDRAWAL OF CONSENT.

You have the right of:

- a. access to your Personal Data,
- b. rectification of your Personal Data,
- c. erasure of your Personal Data,
- d. restriction of Processing of Personal Data,
- e. objection to Processing of Personal Data,
- f. data portability (i.e. the right to receive your Personal Data which you provided us, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from Jet Delayed),
- g. withdrawal of consent for Processing of Personal Data.

If you wish to exercise any of the above mentioned rights, please contact the ‘Data Protection Officer’ on the following [legal@jetdelayed.com](mailto:legal@jetdelayed.com)

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## 8. RIGHT TO COMPLAINT

You may submit a complaint with Jet Delayed in case you believe that your rights as enshrined in the Privacy Policy and the General Data Protection Regulation are violated. Please contact the 'Data Protection Officer' on the following email address: [legal@jetdelayed.com](mailto:legal@jetdelayed.com)

You have the right to lodge a complaint with a supervisory authority dealing with Personal Data protection at any time.

The supervisory authority in Cyprus is the Commission for Personal Data Protection, address: Kypranoros 15, Nicosia 1061, Cyprus and Email: [commissionerdataprotection.gov.cy](mailto:commissionerdataprotection.gov.cy)

## 9. MISCELLANEOUS PROVISIONS

This Privacy Policy is an integral part of Jet Delayed's Term and Conditions.

You provide your Personal Data voluntarily, and there is no legal or contractual obligation to do so. However, providing your Personal Data is necessary to enter into an agreement and for the proper performance of our services, including the creation of a user account and submission on our website.

Jet Delayed takes the security of your Personal Data seriously and complies with all relevant legal requirements. It is essential that the client provides accurate and correct Personal Data. Submissions of inaccurate data information may lead to termination of the contact. If you need to correct any submitted information, please feel free to contact us anytime.

## 10. COOKIES

To make this site works properly, we sometimes place small data files called cookies on your device. Most big websites do this too.

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

A number of our pages use cookies to remember:

- a. your language preferences
- b. your active user session
- c. if you have already replied to a survey pop-up that asks you if the content was helpful or not (so you won't be asked again)
- d. if you have agreed (or not) to our use of cookies on this site

The cookie-related information is not used to identify you personally and the pattern data is fully under our control. These cookies are not used for any purpose other than those described here.

Jet Delayed Limited's website and its partners use cookies or similar technologies to ensure the best user experience and to analyse trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. Cookies are small text files that are placed on your device to track usage patterns and record preferences. Our cookies do not contain information that can directly identify persons. There may be extraordinary situations in which Google, acting in accordance with the law, transmits the full IP address without anonymisation. We gather certain information automatically by the use of cookies and tracking technologies such as Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, the files viewed on our site (e.g. HTML pages, graphics), operating system, date/time stamp, and/or clickstream data to analyse trends in the aggregate and administer site.

We utilize Google Analytics, a service provided by Google Inc, which places a "cookie" on your computer when you visit our website. Google stores this data on its servers. The information collected is used for monitoring website activities and is not combined with other users' data. You have the option to control cookies at the browser level, but disabling them might limit certain features on our website or service. To prevent Google from collecting this data, you can either configure your browser settings accordingly or install a specific plugin. However, this might restrict your ability to fully utilize Jet Delayed's services. Therefore, you can control and/or delete cookies as you wish – for details, see [aboutcookies.org](http://aboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

## 11. CHANGES TO THIS PRIVACY STATEMENT

This Privacy Statement may be updated from time to time, e.g. due to modifications of relevant legislation or changes to our corporate structure. If any material changes are made, you will be notified by e-mail or by means of notice on the website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

**Jet Delayed**

Theseos 7, Strovolos, P.C. 2042, Nicosia, Cyprus

Email: [help@jetdelayed.com](mailto:help@jetdelayed.com)

Website: [www.jetdelayed.com](http://www.jetdelayed.com)

