XCMXFA PRIVACY AND COOKIE NOTICE

Last updated: 22-OCT-22

This privacy notice applies to the use by XCMXFA.COM of personal information of which we are a "Data Controller". That includes personal information of individuals who have registered a subscription to use the website / webapp for xcm/xfa flight listing and booking processes, and of the contact points we have at our booking / listing facilitators such as KLM Passage Back Office, AF/KLM Station Managers/Asst Managers/Station Staff, and Airport Ground/Pax handling organisations.

This privacy notice doesn't apply to our booking / listing facilitators' use of your personal information or to our use of that personal information on the individuals behalf, for which we're a "Data Processor". Please contact the corporate entity (e.g. the KLM Passage Back Office) and ask for their privacy notice if you want to know about their use of your personal information.

Introduction and summary

Our privacy notice tells you how we collect, use and share your personal information and what your rights are – and how to exercise them.

This notice applies to you if you are:

- An individual user, for example an XCM or XFA traveller who is registering / has registered to use the website www.xcmxfa.com and the flight listing / booking facility therein
- A corporate contact: a member of staff at KLM Passage back office or AF/KLM Station staff or staff of a Ground/Pax handling organisation that interacts with our website or communications
- · A supplier: a sole trader or partnership or a contact for us at a corporate supplier who provides services to us
- · A consultant: an adviser, consultant, or other professional expert
- · A job applicant: someone who is offered a job position and is interested in joining us

- · An interested person: an individual who is not a registered user of the website who makes an enquiry, complaint or with whom we correspond
- · A relative of a member of our staff: a close family member or next of kin of a member of our staff, or
- A website visitor or user of one of our apps: a visitor to our website or app user who isn't in any of the categories above.

By "personal information" we mean personal data as defined in UK data protection law. In general, it means any information relating to you, which identifies you or allows you to be identified. That may be your name, an ID number, location, an online identifier or factors specific to you (e.g. physical, physiology (thoughts, feelings), genetic, mental, economic, cultural or social factors).

By "sensitive" personal information we mean two things: 1. what's technically known as "special categories" (personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or data concerning an individual's sex life or sexual orientation) and 2. criminal data (criminal offences or related security measures, including the alleged commission of offences, proceedings for an offence committed or alleged to have been committed or the disposal of those proceedings, including sentencing).

Brexit: references to "GDPR" will include any "UK GDPR" created by the UK Data Protection Act 2018 on the UK's exit from the European Union.

This statement is divided into 5 parts:

Part 1: Introduction and summary

Part 2: Important information about your rights in relation to consent and to object to our use of your personal information

Part 3: Key information required by the GDPR

Part 4: A quick word about our corporate customers

Part 5: Cookies and similar technologies

If you have any queries about this privacy notice, please contact us. Please see "Our identity and contact details" in section a of "Key information required by the
GDPR" below for our contact details.

Introduction and Summary

Type of individual	Our main uses of your personal information	Where to find out more
An individual user, for example an XCM or XFA traveller who is registering / has registered to use the website www.xcmxfa.com and the flight listing / booking facility therein (customer)	 To provide you with access to the website and to submit xcm/xfa/xxdhc flight listing requests on your behalf to third parties. Whilst we may refer to you as our customer purely for the purposes of this statement, there is no explicit contract for services. To keep accounts and records as may be necessary. We may occasionally send you emails advising of new / updated website services, advising the status of your flight booking / listing requests, requesting feedback on performance of the website, etc. If you would rather we don't do this, please just let us know at any time. 	How to withdraw your consent or object to our use (where applicable) Look in Part 2. It tells you how to withdraw any consent you've given (see section j as well) and how to object to both direct marketing and to our use where it's based on a balancing test (called "legitimate interests") which involves weighing our interests or a third party's interests against your rights.
		Other information Look in Part 3; here's what's in the different sections. • Sections a and b: our contact details
A corporate contact: a member of staff at KLM Passage back office or AF/KLM Station staff or staff of a Ground/Pax handling organisation that interacts with our website or communications	 To liaise with you and / or your employer in order to provide agreed services to our users. This may include emails. To keep accounts and records. 	 Section c: the purposes and legal basis for our use of your personal information Section d: the legitimate interests often underpinning our use of your

A supplier: a sole trader or partnership or a contact for us at a corporate supplier who provides services to us as a business	 To receive agreed services from you or your employer or company. To keep accounts and records. 	personal information Section e: the types of personal information we may get from someone other than you
A consultant: an adviser, consultant or other professional expert who provides services to us as a business	 To receive agreed services from you or your employer or company. To keep accounts and records. 	 Section f: third parties with whom we may share your personal information Section g: transfers (exports) of
A job applicant: someone who is interested in working for us	To enter into a services or employment contract or similar contract with you.	 personal information Section h: storage periods Section i: your GDPR rights
An interested person: an individual who is not a registered user of the website who makes an enquiry, complaint or with whom we correspond	To respond to your enquiry or complaint.	 Section j: withdrawing consent Section k: complaints to the ICO Section I: information you must
A relative of a member of our staff: a close family member or next of kin of a member of our staff	Our member of staff may give us your name, address and date of birth which we may use to contact you in an emergency.	provide (either by law or under a contract) • Section m: sources of personal information (where you aren't the source). • Section n: automated decisions
A website visitor or app user: a visitor to our website or user of one of our apps who isn't in any of the categories above.	 Our website: we don't make any routine use of your personal information (such as an online identifier) but we do use a couple of cookies. Unless you complete a registration form on our website we probably can't identify you. Our apps: our app is a wrapper for the website, so collects the same personal information as the website. The app collects loging. 	Look in Part 3: Sections a and b: our contact details Section i: your GDPR rights Section k: complaints to the ICO
	same personal information as the website. The app collects login details and connects to xcmxfa.com via our API.	Section m: sources of personal

information (where you aren't the source). Look in Part 5: cookies and similar technologies
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Important information about your rights in relation to consent and to object to our use of your personal information

Your rights in relation to consent: You may, at any time, withdraw your consent to us using your personal information as summarised below.

We will rely on your accept/reject response to cookies the first time you land on our site to indicate your consent to the use of cookies on our website. To withdraw your consent, please adjust your browser settings or delete the consent cookie. Please see "Cookies and similar technologies" below for instructions.

Your right to object to our use of the "legitimate interests" basis for processing: You may, at any time, object to direct marketing and our use of your personal information which is based on our own legitimate interests, as summarised below.

We consider that our use of your personal information for:

- · Business operation and improvement
- · Customer relationship management
- Supplier relationship management
- Direct marketing
- · Reporting possible criminal acts/threats to competent authorities
- Non-repetitive transfers of a limited number of individuals' personal information

is in our legitimate interests.

You may object to our use on that basis. To exercise your right, please contact us.

Please see:

- \cdot section a in "Key information required by the GDPR" below for our contact details
- section d in "Key information required by the GDPR" below for further details of our reliance on the legitimate interests basis for processing, and
- section i in "Key information required by the GDPR" below for further details of your right to object.

■ Key information required by the GDPR

Here are important details about us and our use of your personal information.

Requirement	Our details		
Our identity and contact details	Name: XcmXfa.com		
Identity and contact details and, where	Company number: Not Register	ed	
applicable, of the representative	Address: Online presence only		
	Tel: +31 646 11 29 30 (Represe	ntative)	
	Email: admin@xcmxfa.com		
	We are not registered with the Ir	nformation Commissioner.	
		ould tell us exactly why you are contact right in the subject line of the email. T	
 Data protection officer and queries Contact details of the data protection officer, where applicable 	We do not have a data protectio are in the "Identity and contact d	n officer. For queries, comments or cor letails" section a above.	mplaints please our contact details
Purposes and legal basis	Here is a summary of the purpos	ses for which we use personal informat	ion and the legal bases for our use.
The purposes of the use for which the personal information is intended as well as the legal	Our purposes	Legal basis (all personal information)	Additional legal basis (sensitive personal information)
Here's a key to the second column: Consent: your consent to one or more specific purposes	To provide GCSEPod services to our customers	Consent (to cookies)ContractLegitimate interests	 Prevention/detection of unlawful acts Regulatory requirements relating to unlawful acts/ dishonesty etc.

Legitimate interests: we've identified this as a legitimate interest of ours or a third party; we consider that use of your personal information is necessary to achieve that legitimate interest; and we've balanced all that against your interests, rights and freedoms The third column gets a bit more technical. Where we're dealing with sensitive personal information we need not one legal basis but two, from a different list (and the list is a lot longer). To maintain our accounts and records Legal obligation Legal obligation Legal obligation Legal obligation Legal claims Legitimate interests To analyse data and produce reports for business planning and management The third column gets a bit more technical. Where we're dealing with sensitive personal information we need not one legal basis but two, from a different list (and the list is a lot longer). The main ones are:	Contract: entering into a contract with you or performing a contract with you	To promote and advertise our services	Legitimate interests	N/A
interests, rights and freedoms The third column gets a bit more technical. Where we're dealing with sensitive personal information we need not one legal basis but two, from a different list (and the list is a lot longer). The main ones are:	this Legitimate interests : we've identified this as a legitimate interest of ours or a third party; we consider that use of your personal information is	records	Legal obligationLegitimate interests	Prevention/detection of unlawful acts
Legal claims: to establish, exercise or defend a legal claim Prevention/detection of unlawful acts: this is where we must use personal information without consent so as not to prejudice preventing or detecting unlawful acts Regulatory requirements relating to unlawful acts and dishonesty etc.: this is where we must use personal information without consent to comply with (or help someone else comply with) a regulatory requirement that involves establishing if someone has committed an unlawful act or is dishonest etc.	and we've balanced all that against your interests, rights and freedoms The third column gets a bit more technical. Where we're dealing with sensitive personal information we need not one legal basis but two, from a different list (and the list is a lot longer). The main ones are: Legal claims: to establish, exercise or defend a legal claim Prevention/detection of unlawful acts: this is where we must use personal information without consent so as not to prejudice preventing or detecting unlawful acts Regulatory requirements relating to unlawful acts and dishonesty etc.: this is where we must use personal information without consent to comply with (or help someone else comply with) a regulatory requirement that involves establishing if someone has committed an	reports for business planning	Legitimate interests	Legal claims

https://ico.org.uk	
· Legitimate interests	Our legitimate interests
Where the use of information is based on the	Our legitimate interests are:
legitimate interests condition, the legitimate interests pursued	Business operation and improvement
	 Customer relationship management: this may include keeping your details on our marketing database, other customer services activities and keeping accounts and records
	 Supplier relationship management: this will mainly be limited to keeping accounts and records but we also use it where appropriate to improve services; this may include information about your performance in providing services to us
	Direct marketing and promotion and advertising of our services
	Reporting possible criminal acts/threats to competent authorities
	Non-repetitive transfers of a limited number of individuals' personal information (see section g)
Personal information collected indirectly	We collect the following categories of personal information indirectly (e.g. from third parties):
- categories	Subscription details, e.g. if a parent buys a GCSEPod subscription as a gift for a child
The categories of personal information collected indirectly	 Staff email address which we use to send out service emails and marketing emails (we get these from your employer)
	Confirmation of payment (from a payment processor)
· Recipients	We may share your personal information with:
The recipients or categories of recipients of the personal information, if any	Payment processors (to process payments, we use SagePay)
personal information, if any	 Email services provider (processor, for sending email marketing, we use Mailchimp (the Rocket Science Group LLC), Pardot (a Salesforce product), and Contact Monkey (which works with Salesforce))

- Customer relationship management software provider (processor, we use Salesforce.com, inc)
- · Legal advisers (for legal claims)
- · Another business, in connection with a merger or acquisition with them

We will not otherwise disclose your personal information to any third party unless required or permitted to do so by law.

· Transfers outside the UK

Where applicable, the fact that personal information is to be transferred to a third country or international organisation and the existence or absence of an adequacy decision, or in the case of transfers subject to appropriate safeguards or non-repetitive, limited transfers based on compelling legitimate interests, reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

Our transfers

We transfer personal information to the following third countries or international organisations:

- · The US:
 - Transfers to Salesforce.com, inc. will covered by their "binding corporate rules", or failing that, by standard contractual clauses. See:
 https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf
 - Transfers to Mailchimp (the Rocket Science Group LLC) will be covered by standard contractual clauses. See https://mailchimp.com/legal/data-processing-addendum/
- Canada:
 - ContactMonkey
- Republic of Ireland and the US:
 - Amazon Web Services (AWS); we use AWS to host GCSEPod; any transfers to Amazon Web Services Inc. in the US (e.g. for the purpose of support) will covered by AWS's "binding corporate rules" if they apply, or failing that, by standard contractual clauses. See: https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf
- Customer locations around the world
 - Our corporate customers and individual subscribers are based around the world; their personal information is stored in the Republic of Ireland, from where they can access it.

· Storage period

The period for which the personal information will be stored, or if that is not possible, the criteria used to determine that period

The period for which we will store personal information is based on our need to fulfil our legitimate business needs, comply with applicable law, resolve disputes, and enforce our agreements namely:

- GCSEPod accounts are anonymised 6 months after the end of a subscription
- · Job applicants' details are kept for 6 months if unsuccessful and otherwise with the personnel file
- · Staff's relatives' details are kept for the duration of employment
- Supplier details may be kept for up to 7 years after the end of the supplier relationship for tax purposes
- Your contact details will be held in our marketing database until you ask to be removed from it or we decide to remove them during a periodic review
- Other customer details may be kept for up to 7 years after the end of the customer relationship for tax purposes
- Cookies placed on your device can be read by our site until they expire or you clear them from your device (please see part 5 below).

· Individual rights

The existence of the right to request access to and rectification or erasure of personal information or restriction of use concerning the individual or to object to use as well as the right to data portability You have rights to make a request to us:

- for access to your personal information
- for rectification or erasure of your personal information
- · for restriction of processing concerning you
- to object to our processing which is based on legitimate interests
- · to object to direct marketing
- to object to archiving in the public interest, research and statistics
- to port (transfer) personal information you have provided to us, either to you or to another provider.

These rights are more complicated than the simple summary above. To find out more about them, please visit the <u>Information Commissioner's website</u>. To exercise your rights, please contact us or ask us for a

	form. Our contact details are in the "Identity and contact details" section a above.
	You can exercise your right to object and unsubscribe from email updates at any time by using the opt-out in the email.
	Please make it clear which right(s) you want to exercise, for example by putting "right to object" in the subject line of the email if you wish to exercise the right to object. Thank you.
· Withdrawal of consent	You have a right to withdraw any consent you give us at any time.
Where the use is based on consent (for	This will not affect the legality of our consent-based use before you withdrew consent.
ordinary or sensitive personal information), the existence of the right to withdraw consent at	To withdraw consent to cookies, please adjust your browser settings (please see part 5 for further details).
any time, without affecting the lawfulness of use based on consent before its withdrawal	To exercise your right to withdraw in any other case, please contact us. Our contact details are in the "Identity and contact details" section a above.
	Please make it clear you want to exercise this right, for example by putting "Withdrawal of consent" in the subject line of the email. Thank you.
· Complaints	You have a right to complain to the Information Commissioner, whose contact details are:
The right to lodge a complaint with a supervisory authority	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF England Telephone: 0303 123 1113 (within the UK, local rate) or +44 1625 545 700 (from outside the UK). Website: https://ico.org.uk which sets out email addresses and an email form.
Information collected directly – legal or contract requirement	If you are a website user, supplier or prospective employee or enquirer, we'll normally need your personal details (name and contact details) to provide subscriptions, receive goods/services, process your application or answer your query.
Whether the provision of personal information is a statutory or contractual requirement, or a	For website user registration, we need a first name, last name, employer name and staff number (for the login procedure).

requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the personal information and of the possible consequences of failure to provide that information	In order to provide flight booking and listing services to website users, we will additionally need date of birth, passport number, nationality, passport expiry date, telephone number, country of residence and email address. (Users travelling to USA/Canada will additionally need to provide API and residence permit / visa information) For suppliers, we may also need your financial details (e.g. bank details and VAT number where applicable) so we can pay you.
Sources of personal information collected indirectly	The main sources of the personal information we collect indirectly are listed in the indirect categories section e above.
The source of the personal information and if applicable, whether it came from publicly accessible sources	
· Automated decision-making	We do not conduct automated decision-making. All decisions about you will be made by humans.
The existence of automated decision-making, including profiling. This means a decision based solely on automated profiling which produces legal effects concerning the individual, and which must not be based on special categories of (i.e. sensitive) personal information without explicit consent or substantial public interest, with safeguards. Meaningful information about the logic involved, as well as the significance and the envisaged consequences of the processing for the individual must also be provided.	

■ A quick word about our corporate customers

A corporate customer is a school, academy, virtual hospital/school, FE/training college or multi-academy trust (MAT).

This privacy notice doesn't apply to our corporate customers' use of your personal information (e.g. if you are a student or member of staff at a school) or to our use of that personal information on the customer's behalf, as their processor.

If you have any queries about how a corporate customer uses your personal information, please ask that organisation directly.

■ Cookies and similar technologies

Introduction

A cookie is a file containing a small amount of information that a website places on your device. Similar technologies include:

- · Local shared objects (Flash cookies) data that websites which use Adobe Flash store on your device
- Local storage (session storage and database storage) a type of file placed on your device that can hold data, often related to video or audio content; we use local storage to track playback information and selections that teachers choose to filter pupils in the school by (for example activated (y/n))
- Pixels (also known as clear gifs, web beacons or web bugs) are code used on a web page or in an email notification. They are used to learn whether you've interacted with certain web or email content. This helps to measure and improve services and personalise your experience.

We use cookies and similar technologies to help us understand how people interact with our website. That means we can make improvements and develop the website in an informed way for our website visitors and members. It helps us improve your overall experience.

The number and type of cookies set will depend on whether or not you have accepted cookies, whether or not you are logged into the site, and your browser and device settings.

What cookies do we use?

We use these types of cookie	for these purposes
Strictly necessary cookies. These cookies are generally used to store a unique identifier to manage and identify you as unique to other users currently viewing the website, in order to provide you with a consistent and accurate service.	To remember previous actions (e.g. entered text) when navigating back to a page in the same session, remembering your preferences, managing logins and other security features, and to remember that you have viewed the privacy notice.

Performance cookies . These cookies are used for performance and to improve the website.	For web analytics (we use Google Analytics – see how Google uses your data here: www.google.com/policies/privacy/partners and https://policies.google.com/technologies/types).
Functionality cookies. These cookies will typically be the result of something you do, but might also be implemented in the delivery of a service not explicitly requested but offered to you. They can also be used to prevent you being offered a service again that had previously been offered to you and rejected.	To provide information to allow an optional service such as a live chat session.
Targeting or advertising cookies. These cookies contain a unique key that is able to distinguish individual users' browsing habits or store a code that can be translated into a set of browsing habits or preferences using information stored elsewhere. Cookies may also be used to limit the number times a user sees a particular ad on a website and to measure the effectiveness of a particular campaign.	 We also use certain information to: Identify new visitors to our website Recognise returning visitors Analyse the effectiveness of our advertisements and email campaigns Better understand our audience, customers, or other site visitors.

- How to see individual cookies and withdraw consent to cookies and similar technologies
 - Cookies

Cookies change and their names and descriptions are not very user-friendly for most people, so we haven't listed them individually. If you want to see the cookies currently used on our website, they should be visible through your browser. (Please see below for instructions.)

To give or withdraw consent to cookies, please use our cookie consent tool or adjust your browser settings.

There are different browsers and manufacturers upgrade them frequently. The best way to get the right instructions is to go to the manufacturer's support page. The following support/privacy pages (for some of the more common browsers) are correct as at February 2020.

- For Chrome, please see Google's support page here: https://support.google.com/chrome/answer/95647
- For Internet Explorer, please see Microsoft's support page here: https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies
- For Edge, please see Microsoft's privacy page here: https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy
- For Firefox, please see Mozilla's support page here: http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
- For Safari, please see Apple's support page here: https://support.apple.com/en-gb/guide/safari/sfri11471/mac (for Macs) https://support.apple.com/en-gb/guide/safari/sfri11471/mac (for Macs) https://support.apple.com/en-gb/guide/safari/sfri11471/mac (for Macs) https://support.apple.com/en-gb/guide/safari/sfri11471/mac (for iPhones and other Apple devices).

If you have problems with these pages, can't see individual cookies or want find out more about how cookies are handled within your browser, please go to the manufacturer's site and search for the browser name and your cookie query.

Flash cookies

To disable flash cookies (local shared objects) go to the Global Storage Settings panel of the online Settings Manager at Adobe's website at http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager03.html. This places a permanent flash cookie on the device, informing all other websites that you do not want flash cookies stored on your device.

Online advertising cookies

We use cookies and similar technologies for online advertising. To find out more and give or withdraw consent, please visit www.aboutads.info/choices.

You can prevent Google's collection of data generated by your use of the sites (including your IP address) by downloading and installing a browser plugin available at https://tools.google.com/dlpage/gaoptout?hl=en.

· Local and session storage

You can delete local storage, session storage and database storage in the same way that you delete cookies.

Pixels

You cannot delete pixels but you may be able to disable them by disabling cookies or by using browser add-ons or extensions. Some pixels in emails can be disabled by selecting an option in your email application not to download images.

Please be aware that restricting cookies and similar technologies may impact on the functionality of our website.

Further information

To find out more about cookies, including how to see what cookies and other technologies have been set and how to manage and delete them, please visit http://www.allaboutcookies.org/ and http://www.youronlinechoices.com/.