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# Brussels Airport Company – Buymyloungepass Privacy Policy

#### 1. Introduction

Brussels Airport Company NV (hereinafter: "**Brussels Airport**") highly values your privacy and aims to protect your personal data in accordance with (i) the General Data Protection Regulation of 25 May 2018, (ii) the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data and (iii) <u>Brussels Airport's Privacy Policy</u>.

As part of the Buymyloungepass, Brussels Airport processes certain personal data. The types of personal data being processed as part of Buymyloungepass and the conditions under which such personal data are being processed, are further clarified in this Buymyloungepass Privacy Policy. The conditions of this Buymyloungepass Privacy Policy apply in addition to the Brussels Airport's Privacy Policy. In the event of any inconsistency between Brussels Airport's Privacy Policy and the Buymyloungepass Privacy Policy, the terms of the Buymyloungepass Privacy Policy will take precedence. Any capitalised terms not defined herein shall have the meaning ascribed to them in the Brussels Airport Privacy Policy or the Terms of Use of the Buymyloungepass.

## 2. Processing of personal data under Buymyloungepass

**Digital access to the lounge**. You can purchase your pass for the Diamond Lounge online. After registration, you will receive an access code (QR code and alphanumeric code) which gives you the right to a one-off access to the Diamond Lounge (pier A or pier B) within one year as of the purchase date.

The Buymyloungepass is a publicly available online platform. Any User can visit the Buymyloungepass without being required to identify itself (a "Visitors"). However, in order to acquire Products and/or Services through the Buymyloungepass, Users will be required to identify themselves on the Buymyloungepass. Users can acquire Products and/Services by creating an account ("Registered Users").

#### 2.1. Visitors

When you are only visiting Buymyloungepass without acquiring any Digital Lounge pass, Brussels Airport will process certain of your personal data. Such personal data will be processed via the use of cookies regardless of whether you are a Visitor or a Registered User.

#### a) Type of personal data

- **Behavioural Information:** such information relates among others to information regarding the manner in which Users are using Buymyloungepass (i.e. browser type, domains, page displays) which is collected via cookies and other automated technologies (see Cookie Policy for more information);
- **Electronic Identification Data:** such information relates to IP addresses (i.e. the unique sequence of numbers that identify each device connected to a network (i.e. laptop, tablet,

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smartphone) with which the communication and exchange of information with other devices on an IP based network, such as the Internet, is made possible);

Location data: location data (based on your IP address).

#### b) Purposes

- Electronic Identification Data and Location Data: are processed for (i) providing access to
  and participation in Buymyloungepass and using Buymyloungepass; (ii) exploiting, evaluating
  and improving Buymyloungepass (including developing additional products and / or services,
  analysing Buymyloungepass and quality control activities), diagnosing technical problems
  and managing technical support and processing questions related to Buymyloungepass; (iii)
  protecting against, identifying and preventing fraud and other illegal activity, claims and
  other liabilities, (iv) commercialising Buymyloungepass.
- Behavioural information: is processed for the purpose of (i) exploiting, evaluating and
  improving Buymyloungepass (including developing additional products and / or services,
  analysing Buymyloungepass and quality control activities), diagnosing technical problems
  and managing technical support and processing questions related to Buymyloungepass; (iii)
  commercialising Buymyloungepass.

#### c) Retention Period

Behavioural Information, Electronic Identification Data and Location data will be processed during the retention period set forth in Article 9 of <a href="https://www.brusselsairport.be/en/privacy-policy">https://www.brusselsairport.be/en/privacy-policy</a>

#### 2.2. Registered Users

#### a) Type of personal data

Brussels Airport may process the following personal data of Registered Users:

- Personal Identification Information: your e-mail address, name and surname, language, optionally your phone number and opt in.
- **Account Information:** your login credentials. Your e-mail and your password are stored but the password is encrypted.

#### b) Purposes

- Personal Identification Information and Account information: these personal data are
  processed for (i) identification purposes, (ii) the management of your account on
  Buymyloungepass, (iii) the execution of your purchase of a Digital Lounge pass for the
  Diamond Lounge at Brussels Airport.
- **Payment Information:** these personal data are processed for (i) the performance of the agreement for the acquisition of Products and/or Services on the Marketplace and (ii) compliance with legal obligations.

#### c) Retention Period

Personal identification and account information, will be retained for a period of maximum 3 years following your latest activity on your Buymyloungepass account. After expiration of this term, all such information will be made anonymous.

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## 3. Sharing personal data as part of Buymyloungepass

#### 3.1. Personal Data shared with 3rd Party Service Providers

In order to provide the Buymyloungepass, Brussels Airport makes use of services offered by third party providers, including but not limited to IT providers providing hosting services, IT platforms, telecommunications services etc. You hereby agree that Brussels Airport is entitled to provide your personal data to such providers for the purposes of the Buymyloungepass.

#### 3.2. Personal Data shared with Payment Services Providers

#### 3.2.1. Personal Data shared with Stripe

As to allow you to purchase Products and/or Services via Buymyloungepass platform, Brussels Airport makes use of a third-party payment service provider: Stripe, Inc. You hereby agree that Brussels Airport is entitled to transfer your Payment Information to such third-party payment services provider. Such Payment Information will subsequently be processed in accordance with the privacy terms of the payment services provider. Such privacy terms can be consulted here (<a href="https://stripe.com/en-be/privacy">https://stripe.com/en-be/privacy</a>)

#### 3.2.2. Personal Data shared with KBC / CBC

As to allow you to purchase Products and/or Services via the KBC Mobile application, Brussels Airport makes use of KBC payment engine and service. You hereby agree that Brussels Airport is entitled to exchange necessary information to successfully complete payments with KBC. Such Payment Information will subsequently be processed in accordance with the privacy terms of the payment that can be consulted here: <a href="https://www.kbc.be/retail/en/legal-information/privacy.html?zone=topnav.">https://www.kbc.be/retail/en/legal-information/privacy.html?zone=topnav.</a>

Nothing contained herein limits or prevents Brussels Airport from disclosing your personal data to the competent authorities further to the request of such competent authorities.

## 4. Your rights

As a Data Subject, you have a number of rights under applicable data protection laws. The specific rights that you have including the manner in which you can exercise these rights, are further specified in Brussels Airport's Privacy Policy. Unless to the extent expressly deviated herein, the processing of your personal data will take place in accordance with <a href="https://www.brusselsairport.be/en/privacy-policy">https://www.brusselsairport.be/en/privacy-policy</a>