

Data Protection Notice for MilesPay

MilesPay Privacy Notice for Brussels Airlines

In this privacy notice, we inform you about the processing of your personal data in connection with the use of MilesPay.

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1. Data protection controllers

MilesPay is operated by Miles & More GmbH, Unterschweinstiege 8, 60549 Frankfurt (“MMG”), which acts as the controller responsible for processing your personal data within the meaning of the EU General Data Protection Regulation (“GDPR”) and the German Federal Data Protection Act (“BDSG”). Full details of MMG can be found in the legal notice. Information on how to contact the Group Data Protection Officer and the competent supervisory authority can be found at the end of this privacy notice.

In addition, our partner Mastercard Europe SA, 198A Chaussée de Tervuren, 1410 Waterloo, Belgium (“Mastercard”), is responsible under data protection law for part of the processing activities. Further information can be found in Sections 2 and 4 of this privacy notice.

2. Your personal data

When using MilesPay, the following personal data are processed:

For the registration of a credit card required and approved for MilesPay and for redeeming award miles, the following information is processed by our partner Mastercard:

- Credit card number, date and time of the transaction, merchant name, purchase amount in euros, foreign currency information
- MMG customer number, MMG frequent flyer status, country of residence, language, mileage account balance, selected award miles redemption limit, number of redeemed award miles

For customer information display and product development, the following information is processed by MMG:

- Credit card number, date and time of the transaction, merchant name, merchant location, purchase amount in euros, foreign currency information
- MMG customer number, MMG frequent flyer status, country of residence, language, mileage account balance, selected award miles redemption limit, number of redeemed award miles

3. Purposes and legal bases of processing

Your personal data are processed to fulfill contractual obligations pursuant to Article 6(1)(b) GDPR.

In addition, we process your data to safeguard our legitimate interests pursuant to Article 6(1)(f) GDPR, in particular:

- for the prevention of fraud (e.g. credit card misuse, identity fraud, obtaining special conditions or fares unlawfully),
- for the assertion of legal claims, including debt collection and defense in legal disputes,
- for audit purposes,
- for data analysis and statistical evaluations to improve products and services (business interest in further developing the program),
- for IT security purposes (business interest in securing our systems), and
- for authentication and fraud prevention (business interest in protection against material and immaterial damage).

4. Recipients of your data

To provide MilesPay and related services based on our contractual obligations or legitimate interests, we use service providers (e.g. service centers or IT service providers) as processors pursuant to Article 28 GDPR. These providers are carefully selected and act exclusively on our instructions, providing sufficient guarantees to comply with data protection requirements.

Where personal data are transferred to third countries, appropriate safeguards are implemented in accordance with legal requirements (in particular EU adequacy decisions or EU standard contractual clauses; information on these clauses is available on the European Union's websites).

In certain cases, we are legally obliged to provide personal data to German and international authorities (Article 6(1)(c) GDPR – legal obligation).

Mastercard processes the data listed in Section 2 partly as a processor for MMG. With regard to payment processing, Mastercard acts as an independent controller. In particular, MMG does not receive participants' credit card numbers.

No transfer of data collected by us to other third parties takes place.

5. Storage period

We process your data for as long as required to fulfill our contractual and legal obligations. Once the purpose for which the data were processed no longer applies, the data are deleted unless retention is required for the following purposes:

- compliance with commercial and tax retention obligations under, for example, the German Commercial Code or the Fiscal Code (up to 10 years),
- preservation of evidence within the scope of statutory limitation periods. According to Sections 195 et seq. of the German Civil Code (BGB), these limitation periods may be up to 30 years, with the regular limitation period being three years.

In such cases, the data are restricted so that they are no longer processed for other purposes.

6. Your data subject rights

6.1 Your rights

Subject to the applicable legal requirements, you may exercise the following rights:

- Right of access, Article 15 GDPR
- Right to rectification, Article 16 GDPR
- Right to erasure (“right to be forgotten”), Article 17 GDPR
- Right to restriction of processing, Article 18 GDPR
- Right to data portability, Article 20 GDPR
- Right to object, Article 21 GDPR

To exercise your rights, you may use our contact form. Please note that to process your request and identify you, we will process your personal data pursuant to Article 6(1)(c) GDPR.

You also have the right to lodge a complaint with a supervisory authority pursuant to Article 77 GDPR in conjunction with Section 19 BDSG.

6.2 Competent supervisory authority

The supervisory authority responsible for MMG is:

The Hessian Data Protection Commissioner
Postfach 31 63
65021 Wiesbaden

Gustav-Stresemann-Ring 1
65189 Wiesbaden

Phone: +49 611 1408-0
Fax: +49 611 1408-900 or -901
Email: poststelle@datenschutz.hessen.de

7. Right to object pursuant to Article 21 GDPR

You have the right, on grounds relating to your particular situation, to object at any time to the processing of your personal data based on Article 6(1)(e) or (f) GDPR.

We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or the processing serves the establishment, exercise, or defense of legal claims.

If your personal data are processed for direct marketing purposes, you have the right to object at any time to such processing. If you object, your personal data will no longer be processed for direct marketing purposes.

You may exercise your right to object using automated means in connection with information society services, regardless of Directive 2002/58/EC.

You may object to the processing of your personal data at any time, including via our contact form.

8. Handling of data within the Miles & More Program

Further information on the handling of personal data within the Miles & More Program can be found in the separate Miles & More privacy notices at www.miles-and-more.com/datenschutz.

9. Data security

We implement technical and organizational security measures to protect your data against accidental or intentional manipulation, loss, destruction, or unauthorized access. These security measures are continuously improved in line with technological developments.

Your personal data are stored on servers located in Germany, in a Member State of the European Union, or in contracting states of the European Economic Area.

10. Updates

We regularly review these privacy notices and update them as necessary. We will inform you of any material changes (e.g. via the app).

11. Data protection officers

The Lufthansa Group Data Protection Officer is also the Data Protection Officer of Miles & More GmbH. For questions regarding data protection at Miles & More, please contact the Group Data Protection Officer (e.g. by post: Deutsche Lufthansa AG, Group Data Protection Officer, FRA CJ/D, Lufthansa Aviation Center, Airportring, 60546 Frankfurt am Main, or by email at datenschutz@dlh.de).