



## Privacy policy for corporate customers

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At SAS, we are committed to protecting your privacy and the personal data you share with us. This privacy policy explains how we process your personal data when you use our website. We aim to always be as clear and transparent as possible. If you have any questions about how we process your personal data, please reach out to us.

### 1. Who is responsible for your personal data?

Scandinavian Airlines System Denmark-Norway-Sweden is the data controller responsible for the processing of data described below. In this privacy policy, "SAS" refers to Scandinavian Airlines System Denmark-Norway-Sweden. "SAS Group" means all companies in which SAS AB (publ), directly or indirectly, from time to time, owns or controls more than 50 percent of the shares.

SAS has appointed a Data Protection Officer to ensure that your personal data is processed correctly. You are always welcome to contact SAS' Data Protection Officer if you have questions or to make requests concerning how we process your personal information at [dataprotectionofficer@sas.se](mailto:dataprotectionofficer@sas.se).

### 2. How SAS processes personal data

SAS collects the personal data that you provide when you use our website. We may also collect your personal data from cookies on our website. You can read more about cookies in [this site's cookie policy](#).

### 3. Activities where SAS handles personal data

#### 3.1 Monitoring web behavior

Type of data: Digital details and behavior, e.g. login information, IP address and web page usage (with consent).

Purpose of processing: To offer a personalized experience on this website.

Legal basis: Consent that you have actively given on this website, see GDPR art. 6 no 1 a.

Retention time: See this site's cookie policy for retention times.

#### 3.2 Profile account

Type of data: Information you provide when registering a profile account, for example name, address, email, phone number, etc.

Purpose of processing: To enable registering a profile account and administer the service.

Legal basis: SAS' obligation to comply with the terms and conditions for profile account holders, see GDPR art. 6 no 1 b.

Retention time: SAS saves this data for as long as you have a profile account.

#### 3.3 Corporate Bookings and Data Sharing with Corporate Customers (CMP Code)

Type of data: Name, contact details (such as e-mail address and telephone number), PNR, ticket number, itinerary details and any other personal data necessary to manage and administer the booking.

Purpose of processing: SAS processes personal data relating to travelers associated with a corporate customer in order to deliver the contracted services, administer and manage corporate travel bookings, and facilitate travel arrangements made using a Corporate Mandatory Prefix (CMP) code. In this context, SAS may share relevant personal data with the corporate customer that uses the applicable CMP code, to enable booking administration, reporting, internal travel management, and related corporate travel services.

Legal basis: The legal basis for processing and sharing this personal data is the performance of a contract in accordance with GDPR Article 6(1)(b), as the processing is necessary to provide and administer corporate travel services requested by the corporate customer. In addition, SAS relies on legitimate interest (see GDPR art. 6 no 1 f.) for certain disclosures of personal data to the corporate customer, where such processing is necessary to support the corporate customer's internal administration, reporting, compliance, and travel management activities. When SAS uses the legal basis of legitimate interest, we document the legitimate interest of SAS to pursue the activity and the individual's right to integrity in a legitimate interest assessment (LIA). Retention time: Personal data processed for corporate booking administration purposes will be retained in accordance with SAS's general retention policies for booking and travel data (please refer to [SAS Privacy Policy](#)), and no longer than necessary to fulfill the purposes described above, unless a longer retention period is required or permitted by applicable law.

#### 3.4 Marketing, events and information

Type of data: Name, phone number and email.

Purpose of processing: The data is processed to plan and conduct sales activities aimed at travel agents, corporate customers and their authorized contact persons, including compiling contact lists for potential event invitations and to inform and market our services and offers to relevant travel agents,



corporate customers and their authorized contact persons.

**Legal basis:** The legal basis of processing this personal data is SAS legitimate interest in marketing our services, see GDPR art. 6 no 1 f. You will always have the option to opt out of this communication.

**Retention time:** We will save your personal data as long as it is necessary with regard to the purpose of the processing, or until you opt out.

### 3.5 Sharing ticket information with Travel Agents to support with errors

**Type of data:** Information stated in the ticket, such as name, PNR, ticket number, EuroBonus number (when used in connection with SAS for Work) etc.

**Purpose of processing:** To support corporate customer and/or its chosen travel agent with corporate specific PNR for assessment of errors and/or ensuring corporate's accessibility to benefits under the corporate contract.

**Legal basis:** Contractual basis to ensure accessibility to benefits and error assessments (see GDPR art. 6 no 1 b.).

**Retention time:** We will save your personal data as long as it is necessary with regard to the purpose of the processing.

### 3.6 Analysis, reporting and statistics on corporate product usage

**Type of data:** We process personal data related to corporate travel and services, including CMP code, PNR, ticket/booking number, name of traveler, name of contact person, email address, EuroBonus number (when used in connection to SAS for Work), purchase history, and product selections.

**Purpose of processing:** The data is processed to

- produce and analyze corporate usage reports (e.g., volumes, booking patterns, channel performance) to support the corporate customer's and SAS program insights;
- plan and conduct sales activities aimed at corporate customers, including compiling contact lists for potential event invitations; and
- generate statistics on corporate product usage to improve, market, and develop relevant services.

Personal data may be shared with the corporate customer's authorized contacts (to increase their understanding of their traveler's usage of SAS' products and for reporting and program insights), the corporate customer's selected Travel Agent (to facilitate and improve agreed service delivery) and relevant SAS internal teams for the purposes above.

**Legal basis:** Legitimate interest (see GDPR art. 6 no 1 f.). When SAS uses the legal basis of legitimate interest, we document the legitimate interest of SAS to pursue the activity and the individual's right to integrity in a legitimate interest assessment (LIA).

**Retention time:** We will save your personal data as long as it is necessary with regard to the purpose of the processing.

### 3.7 Unruly behavior

**Type of data:** Traveler's name, PNR, ticket number, e-mail, EuroBonus number (when used in connection with SAS for Work) etc.

**Purpose of processing:** The SAS Conditions of Carriage, including Article 24, apply to all passengers travelling on bookings that include a Corporate Mandatory Prefix (CMP) code. SAS reserves the right to disclose information regarding such passengers to the company associated with the relevant CMP code, as that company is deemed responsible for the conduct of individuals traveling under that CMP code.

**Legal basis:** To fulfill contractual obligations (see GDPR art. 6 no 1 b).

**Retention time:** As long as it is necessary with regard to the purpose of the processing.

### 3.8 Marketing to prospective corporate customers

**Type of data:** Name, phone number, email address, job title, company affiliation, and publicly available business contact information.

**Purpose of processing:** The data is processed to plan and conduct sales and marketing activities directed at prospective corporate customers, including contacting designated company representatives by phone to present, promote, or provide information about SAS for Work, Travel Pass products, and other relevant SAS corporate offerings.

**Legal basis:** The legal basis for processing this personal data is SAS's legitimate interest in marketing its services to relevant business contacts, in accordance with GDPR Article 6(1)(f). When SAS relies on legitimate interest, we document both the business interest and the individual's privacy rights in a legitimate interest assessment (LIA). You will always have the option to opt out of such communications.

**Retention time:** We will save your personal data as long as it is necessary with regard to the purpose of the processing, or until you opt out.

### 3.9 Surveys and interviews

**Type of data:** Name, e-mail address and telephone number.



Purpose of processing: We process personal data to distribute surveys aimed at improving and developing relevant services and offerings. SAS may also contact the customer by e-mail or telephone for follow-up interviews or additional feedback, including outreach intended to increase participation in SAS for Work.

Legal basis: The legal basis for processing this personal data is SAS's legitimate interest in marketing its services to relevant business contacts, in accordance with GDPR Article 6(1)(f). When SAS relies on legitimate interest, we document both the business interest and the individual's privacy rights in a legitimate interest assessment (LIA). You will always have the option to opt out of such communications.

Retention time: Personal data processed for survey purposes will be retained for six (6) months following the final day of the survey.

#### 4. Disclosure of personal data

SAS will only share your personal data with companies within the SAS Group except in the situations described below.

##### 4.1 Subcontractors and third parties

Your personal data will also be shared with IT providers and developers that ensure the operation and security of our IT systems if necessary in order for us to deliver this service to you.

##### 4.2 Corporate customers

When travelling under a CMP code, your personal data may also be shared with the company associated with the relevant CMP code.

##### 4.3 Travel Agents

We are also sharing the data with Travel Agents in order to increase their service delivery to their corporate customers.

#### 5. Personal data processing outside EU/EEA

Personal data will be transferred between companies in the SAS Group to administer and maintain your account and membership and for statistical purposes. Personal data that is shared within the SAS Group in this way or with subcontractors and third parties as described above in Section 4. will sometimes be transferred to countries that are not members of the EU or the EEA and that do not ensure a satisfactory level of security for personal data.

Such transfers are carried out in accordance with the prevailing law on data protection, such as adequacy decisions and additional contractual clauses. When personal data is transferred to a non-EU/EEA country without satisfactory levels of protection for personal

data, we apply appropriate measures, as a minimum, by including a standard contractual clause that has been adopted by the European Commission.

These standard contractual clauses can be found at [Standard Contractual Clauses \(SCC\) \(europa.eu\)](https://european-commission.europa.eu/Standard-Contractual-Clauses-SCC)

#### 6. How SAS protects your personal data

We have taken extensive technical and organizational measures to protect your data from loss, abuse or unauthorized access. Processing and transferring data between your web browser and our server is protected by encryption and we constantly update our security measures.

#### 7. Your rights

You have a number of rights related to your personal data. You can always reach out to SAS' Data Protection Officer with a request at [dataprotectionofficer@sas.se](mailto:dataprotectionofficer@sas.se)

##### 7.1 Revocation of consent

if we process information about you based on your consent, for example using cookies, you have the right to revoke your consent at any point in time. We will then terminate the processing of the personal data based on your consent.

##### 7.2 Correction

If your personal data that SAS processes is incorrect or incomplete, you can reach out to SAS' Data Protection Officer [dataprotectionofficer@sas.se](mailto:dataprotectionofficer@sas.se)

##### 7.3 Right to restrict processing

In certain circumstances, you have the right to restrict SAS' use of your personal data, which means you can limit the way we use your personal data. This is an alternative to requesting the erasure of your data, which is outlined below. This means that SAS will stop using the data except for storing it.

##### 7.4 Right to access

You have the right to request a copy of your personal data. If you have any problems with the online form, just contact SAS' Data Protection Officer. You can find out more about the process on SAS' website under Manage my data

##### 7.5 Right to complain

It is important that you feel confident that SAS processes your personal data with the utmost respect. If you are uncertain as to how SAS processes your personal data or have any complaints, you are welcome to contact SAS' Data Protection Officer. You may also file a grievance at the Swedish Data Protection Authority or the data protection authority of your country.

## 7.6 Right to object

You have the right to raise an objection at any point in time to the processing of your personal data that is based on our legitimate interest. If SAS cannot demonstrate compelling legitimate grounds for the processing of your data that outweigh your interests, rights and freedoms or that the processing is being carried out to establish, exercise or defend legal claims, SAS will no longer process your personal data.

## 7.7 Right to data portability

You have the right to request to receive your personal data that we process in a machine-readable format, which you have the right to transfer to another company. This can be done if you want to reuse your personal data for your own purposes across different services.

## 7.8 Right to be forgotten

Your right to erasure means that you can request that we delete the personal data we have related to you. We will do so without undue delay, unless we are legally required to process the information, e.g. for financial or accounting purposes, or we have another lawful reason to continue processing the data, e.g. for carrying out a requested trip. You can exercise your right here: [dataprotectionofficer@sas.se](mailto:dataprotectionofficer@sas.se)

## 8. Changes in this Privacy Policy

We update this privacy policy periodically, but the latest version will always be available on this website.

## 9. Processing of personal data in China

### 9.1 Processing of personal data in China

This section is applicable to users in the People's Republic of China (hereinafter "China") and describes how we collect, use, store, share and disclose your personal data in China and it supplements other generally applicable sections of this privacy policy. Should any inconsistency or deviation arise, the provisions provided in this China section will take precedence over provisions set out in other generally applicable sections of this privacy policy. It applies to personal data we collect from or about you when you use this website. By continuing to use this page, you agree to the collection and use of your personal data in accordance with the provisions of this privacy policy.

### 9.2 Updates

SAS reserves the right to modify the China section of this privacy policy and publishes updated versions of this policy in accordance with laws and regulations regarding data protection in China. To the extent SAS

materially changes the China section of this privacy policy, SAS will inform you of such changes and, to the extent this affects the purposes and processing for which we have obtained your consent, we will re-seek your consent. To exercise your data protection rights and/or if you have any questions or comments regarding this China section of privacy policy, contact SAS' Data Protection Officer at [dataprotectionofficer@sas.se](mailto:dataprotectionofficer@sas.se).

### 9.3 How SAS collects & receives your information

This part constitutes a supplement to the "When and how we process your personal data" section of this privacy policy and Section 3 of this China section.

SAS may collect and receive personal data from users located in China through cookies or web requests. The type of personal data collected and received may include, without limitation, the user's name, email address, phone number, mailing address, web usage metrics and device information such as IP address. SAS may use such information to receive feedback about the website and services, as well as to track and analyze use of the website.

### 9.4 How SAS uses your data

This part describes the personal data we collect about or from you, the purposes for which we use it and why we use it for our basic and expanded business functions. Your personal data will be collected and processed in accordance with the Personal Information Protection Law (PIPL) which came into force on 1 November 2021, and any other laws and regulations of China that govern this area.

Any processing of personal data that we perform is in accordance with the provisions of the privacy laws in China, and this data may only be used for the limited purposes discussed in this part. Scandinavian Airlines System Denmark-Norway-Sweden is responsible for the processing of your personal data via SAS' websites and in association with the use of SAS' services.

In order to provide you with travel ticketing services and other SAS services and products, we need to collect and use certain personal data. The personal data that we may request that you provide to us or that we may collect and use about you is outlined below. Please note that some service features require personal data before they can be provided. After you exercise your right to object, we will be unable to continue providing the service corresponding to the personal data involved in the objection and we will no longer process your corresponding personal data.

We may request that you provide us with the following personal data:

### 9.5 Profile account holder information

This information includes your site profile account number, name, age, address and contact information. This information is used to maintain you as our profile account holder and manage your account. Please note that we *collect, store, use and transfer your sensitive personal data for the purposes for which it was provided and otherwise in accordance with the terms of this privacy policy if you provide your explicit consent at the time of collection.*

#### 9.6 Legal basis for SAS processing personal data

Our legal basis for processing your personal data described above depends on the personal data in question and the specific circumstances where we process it. We generally only collect personal data from you when:

- We have obtained your consent to do so.
- Such data is necessary for us to perform a contract with you.
- The processing is in our legal interests and not overridden by your rights.
- We have legal obligations to process your personal data from you or may otherwise need the personal data to protect your vital interest or that of other persons.
- It is necessary for responding to a public health emergency or for protecting the life, health and property safety of a natural person.
- Acts, such as news reporting and supervision by public opinions, are carried out for the public interest, and the processing of personal data is within a reasonable scope.
- It is necessary to process the personal data disclosed by the individual concerned or other personal data that has been legally disclosed within a reasonable scope in accordance with the provisions of PIPL and related laws and regulations.
- In other circumstances prescribed by laws and administrative regulations.

#### 9.7 Who does SAS share your information with?

We may share your personal data we collect or receive with:

- IT providers and developers that ensure the operation and security of our IT systems on behalf of SAS.
- Security companies and businesses that work to prevent and combat fraud.

- Companies within the SAS Group, including, but not limited to, SAS EuroBonus AB, SAS Link AB, Scandinavian Airlines Ireland Ltd, SAS Ground Handling A/S, SAS Ground Handling AS, SAS Ground Handling AB, SAS Cargo Group A/S, SAS Cargo Norway AS and SAS Cargo Sweden AB.
- Government agencies and authorities, law enforcement officials and courts of law.
- Third parties: (a) if we believe disclosure is required by applicable law, regulation or legal process (such as pursuant to a judicial order) or (b) to protect and defend our rights or the rights or safety of third parties, including to establish, make or defend against legal claims.

#### 9.8 Exercising your rights

SAS fully respects your right to know, access, rectify, restrict the processing of and delete your personal data, etc.

#### 9.9 Right of access

You have the right to obtain confirmation from us as to whether personal data about you is being processed, and, where this is the case, to request access to the personal data. The access information includes the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data has been or will be disclosed.

You have the right to obtain a copy of the personal data that is being processed. For additional copies requested by you, we may charge a reasonable fee based on our costs.

#### 9.10 Right to rectify

You have the right to obtain the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### 9.11 Right to delete

You have the right to request that we delete your personal data.

#### 9.12 Right to object

You have the right to object at any time to the processing of your personal data by us for certain purposes. If you exercise this right to object, your personal data will no longer be processed for such purposes by us. Exercising this right will not incur any costs. However, such a right to object may not exist in certain circumstances, e.g., if the processing of



your personal data is necessary to take steps prior to entering a contract or to perform a contract already concluded.

#### 9.13 Right to delete an account

You have the right to cancel a previously registered account at any time.

Once completion of the cancellation of your account, all information therein will be deleted or anonymized and we will no longer collect, use or provide the personal data relating to the account to third parties. Nevertheless, the information provided by you or generated during your use of our services will need to be retained by us for the period required by laws and regulations, and authorities will have the right to access such information according to law during that legal retention period.

To exercise these rights, make a request to [securedata@sas.se](mailto:securedata@sas.se). For SAS to verify your identity, your written request should include your name and address and other information that will help us identify you, such as:

- Any email addresses that you have used in communication with SAS.
- Any phone number you have used in communication with SAS (for example, in customer service cases).

SAS must always ensure that the right person receives information about how we process their personal data.

SAS will only disclose personal data if we can verify your identity in accordance with the above. After we receive a request to exercise any of these rights, we will provide information on the action we will take regarding the request without undue delay and in any event within 30 days of receipt of the request. This period of time may be extended by a further 30 days in certain circumstances, for example, where requests are complex or numerous.

#### 9.14 Security

Information security is important to SAS. We have adopted proper measures such as separate storage, encryption, access control, de-identification etc., in accordance with the requirements of data classification and categorization, to protect your information security from unauthorized access, disclosure, loss, misuse, alteration or improper use of your information and to avoid any negative impact on your personal rights and interests.

#### 9.15 Minors

SAS places great importance on the protection of the personal data of minors. If you are under age 14, you must obtain written consent from a parent or legal guardian to use this website. For the collection of

personal data of minors with the consent of their parents or legal guardians, we only use or disclose this information with the permission of the law, the explicit consent of the parents or guardians or the necessary protection of the minors. If a minor has provided us with personal data without parental or guardian consent, the parent or guardian may contact us by emailing us at [securedata@sas.se](mailto:securedata@sas.se) and we will remove the information.