

Privacy policy

In this privacy policy we, Flyhelp, explain how we handle your personal data when you visit our website and use our services.

We will ask you to consent to our use of cookies in accordance with the terms of this notice when you first visit our website.

Our website incorporates privacy controls which provide you with controls on deciding how we will process your personal data. By using privacy controls you can specify whether you would like to receive direct marketing communications as well as limit the amount of information that we receive through cookies.

In this notice you will find the answers to the following questions:

- how we use your data;
- when we provide your data to others;
- how long we store your data;
- what is our marketing policy;
- what rights related to personal data you possess;
- how we use cookies;
- other issues that you should take into account.

In case of any inquiries or if you would like to exercise any of your rights provided in this notice, you may submit such inquiries and requests by means provided in [Contacts](#) section.

You may contact our data protection officer by email: privacy@Flyhelp.com.

1. HOW WE USE YOUR PERSONAL DATA?

1.1. This Section provides the following information:

- categories of personal data, that we process;
- in case the personal data that we did not obtain directly from you, the source and specific categories of that data;
- the purposes for which we may process your personal data;
- the legal bases of the processing.

1.2. We process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. We obtain such data through the use of cookies and similar technologies. We process such data to have a better understanding of how you use our website and services. The legal basis for this processing is our legitimate interest, namely monitoring and improving our website and services.

1.3. We process your account data ("**account data**"). The account data may include your name and email address, phone number, date of birth and other data that you provide while registering. We obtain such data directly from you. We process account data for the purposes of operating our website, providing our services, ensuring the security of our website and services and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract as well as our legitimate interest, namely monitoring and improving our website and services.

1.4. We process information relating to provision of services by us to you ("**service provision data**"). The service provision data may include your contact details, payment details and information, related to services (information on the relevant flight, documents necessary for claim, communication for the purpose of service provision and similar). The service provision data is processed to provide services and keep proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.

1.5. We may process information that you provide to us for the purpose of subscribing to our email messages and newsletters ("**messaging data**"). The messaging data is processed to send you the relevant messages and newsletters. The legal basis for this processing is your consent. Also, if we have already provided services for you on our website and you do not object, we may also process messaging data on the basis of our legitimate interest, namely on seeking to maintain and improve customer relations.

1.6. We may process information relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. In case of communication through our website, the website will generate the metadata associated with communications made using the website contact forms. The correspondence data is processed for the purposes of communicating with you and

record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business, ensuring uniform and high quality consultation practice and for investigating disputes between you and our employees.

1.7. We may process any of your personal data identified in this notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

1.8. We may process any of your personal data identified in this notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

1.9. In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2. WHEN WE PROVIDE YOUR DATA TO OTHERS?

2.1. We may disclose your personal data to any member of our group of companies (including our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this notice.

2.2. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

2.3. We may disclose your personal data to our payment service providers. We will share service provision data with our payment services providers only to the extent necessary for the purposes of processing your payments, transferring funds and dealing with complaints and queries relating to such payments and transfers].

2.4. We may disclose your personal data to other service providers insofar as it is reasonably necessary to provide specific services (including, website hosting service providers, courier service providers, providers of servers and maintenance thereof,

email service providers). We take all the necessary measures to ensure that such subcontractors would implement proper organisational and technical measures to ensure security and privacy of your personal data.

2.5. In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.6. Persons indicated in this Section may be established outside Lithuania, European Union and European Economic Area. In case we will transfer your personal data to such persons, we will take all the necessary and in the legal acts indicated measures to ensure that your privacy will remain properly secured.

3. HOW LONG WE STORE YOUR DATA?

3.1. Your personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. In any case, it shall be kept for no longer than:

- access data will be retained for no longer than 3 (three) years following your last update on the account or 10 (ten) years following the end of provision of services (whichever is the latter);
- service provision data will be retained for no longer than 10 (ten) years following the end of provision of services;
- messaging data will be retained for no longer than 2 (two) years following the provision of consent or, in case, the messaging data is being sent to the present clients in order to maintain and improve customer relations, for no longer than 2 (two) years following the end of provision of the respective services;
- communication data will be retained for no longer than 2 (two) months following the end of such communication.

3.2. In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. I. e. usage data will be retained for as much as will be necessary for the relevant processing purposes.

3.3. Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. MARKETING MESSAGES

4.1. In case you consent, we will send you marketing messages via email and/or SMS to inform you regarding any relevant information related to what we are up to.

4.2. Also, if we already have provided services to you and you do not object we will inform you about our other products that might interest you including other information related to such.

4.3. You may opt-out of receiving marketing messages at any time.

4.4. You may do so by:

- choosing the relevant link in any of our marketing messages;
- contacting us via means provided in the [Contacts](#) section.

4.5. Upon you having fulfilled any of the provided actions we will update your profile to ensure that you will not receive our marketing messages in the future.

4.6. Please be informed that as our business activities tend to consist of a network of closely related services, it may take a few days until all the systems are updated, thus you may continue to receive marketing messages while we are still processing your request.

4.7. The opt-out of the marketing messages will not stop you from receiving messages directly related to the provision of services.

5. YOUR RIGHTS

5.1. In this Section, we have summarised the rights that you have under data protection laws. Some of the rights are complex thus we only provide the main aspects of such rights. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

5.2. Your principal rights under data protection law are the following:

- the right to access data;
- the right to rectification (note that you may exercise most of this right by logging into your account [here](#));
- the right to erasure of your personal data;
- the right to restrict processing of your personal data;
- the right to object to processing of your personal data;
- the right to data portability;

- the right to complain to a supervisory authority; and
- the right to withdraw consent.

5.3. The right to access data. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply you with a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

5.4. The right to rectification. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

5.5. In some circumstances you have the right to the erasure of your personal data. Those circumstances include when: (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw consent to consent-based processing and there are no other legal basis to process data; (iii) you object to the processing under certain rules of applicable data protection laws; (iv) the processing is for direct marketing purposes; or (v) the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. Such exclusions include when processing is necessary: (i) for exercising the right of freedom of expression and information; (ii) for compliance with our legal obligation; or (iii) for the establishment, exercise or defence of legal claims.

5.6. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are when: (i) you contest the accuracy of the personal data; (ii) processing is unlawful but you oppose erasure; (iii) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and (iv) you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data, however, we will only further process such data in any other way: (i) with your consent; (ii) for the establishment, exercise or defence of legal claims; (iii) for the protection of the rights of another person; or (iv) for reasons of important public interest.

5.7. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the

processing is that the processing is necessary for: the performance of a task carried out in the public interest or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

5.8. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

5.9. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5.10. The right to data portability. To the extent that the legal basis for our processing of your personal data is:

- consent; or
- performance of a contract or steps to be taken at your request prior to entering into a contract, necessary to enter into such,

you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

5.11. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. Our data processing is supervised by the State Data Protection Inspectorate of Lithuania, registered office at A. Juozapavičiaus St. 6, LT-09310, www.ada.lt.

5.12. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

5.13. In addition to specific measures provided in this Section or the website, you may also exercise any of the rights indicated herein by contacting us via [Contacts](#).

6. ABOUT COOKIES

6.1. Cookies are small textual files containing an identifier that is sent by a web server to your web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

6.2. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

7. COOKIES THAT WE USE

On our website we use cookies of three main types, for the following purposes:

- Required cookies – used to ensure proper performance of the website, security of customers and their data, provision of high quality services and effortless set-up of an account;
- Functional cookies – used to enhance the website user experience, analyse the use of the system and in accordance to such improve the provision of services;
- Advertising cookies – used to observe user online behaviour and optimize marketing campaigns according to such information.

8. COOKIES USED BY OUR SERVICE PROVIDERS

8.1. Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

8.2. We use:

- **Zopim cookies** to enable website users experiencing problems to contact us in real time. Cookies used for this purpose help us accelerate provision of customer service to our clients. You can view the privacy policy of Zopim [here](#);
- **Cloudflare cookies** to identify users visiting the website and to adapt security settings. Cookies used for this purpose help us protect both our website and its users. You can view the privacy policy of Cloudflare [here](#);
- **Google Analytics** cookies to observe our website traffic. Cookies used for this purpose help us detect website errors as well as measure website bandwidth. You can view the privacy policy of Google Analytics [here](#);
- **Facebook (login)** cookies to enable users creating account on our website. Cookies used for this purpose help us provide alternative way to set-up an account. You can view the privacy policy of Facebook [here](#);

- **Google (login) cookies** to enable users to create account on our website. Cookies used for this purpose help us provide an alternative way to set-up an account. You can view the privacy policy of Google [here](#);
- **Youtube cookies** to display in our website content uploaded in Youtube. Cookies used for this purpose help us maintain integrity, create informative and dynamic website. You can view the privacy policy of Youtube [here](#);
- **Twitter cookies** to display in our website content posted on Twitter. Cookies used for this purpose help us maintain integrity, create an informative and dynamic website. You can view the privacy policy of Twitter [here](#);
- **Hotjar cookies** to observe how users use our website. Cookies used for this purpose help us observe the performance of the website and analyse how we can improve our website. You can view the privacy policy of Hotjar [here](#);
- **Yandex cookies** to identify the device used by the user as well user's behaviour in our website. Cookies used for this purpose help us adapt our website settings to specific user/device and analyse how we can improve our platform. You can view the privacy policy of Yandex [here](#);
- **Google Maps cookies** to, if the user permits, determine users location. Cookies used for this purpose help us adapt website settings in accordance to user's location and improve user experience in our website. You can view the privacy policy of Google Maps [here](#);
- **DoubleClick cookies** to control the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of Doubleclick [here](#);
- **Facebook cookies** to manage the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of Facebook [here](#);
- **Google Tag Manager cookies** to control advertising cookies. Cookies used for this purpose help us properly distribute ads to users. You can view the privacy policy of Google Tag Manager [here](#).

9. HOW CAN YOU MANAGE COOKIES?

9.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via information provided in the relevant browser website, for example [Chrome](#); [Firefox](#); [Internet Explorer](#); [Safari](#).

9.2. Blocking all cookies will have a negative impact upon the usability of many websites.

9.3. If you block cookies, you will not be able to use all the features on our website.

10. COOKIE PREFERENCES

You can manage your preferences relating to the use of cookies on our website by visiting [here](#).

11. THIRD PARTY WEBSITES

On the website you may find links to and from partner sites, information sources and related party websites. Please take note that such third party websites that you will visit by clicking on links have their own privacy policies and we take no responsibility regarding such privacy policies. We recommend familiarising with privacy policies of such websites before providing any personal data to such.

12. CHILDREN PERSONAL DATA

12.1. Our website and services are targeted at persons over the age of 16.

12.2. We process personal data of younger persons than provided above only upon the parent rights holder providing consent to do so.

12.3. If we have reason to believe that we hold personal data of a person under that age in our databases without having consent from the parent rights holder, we will delete that personal data.

13. UPDATING YOUR DATA

Please let us know if the personal information that we hold about you needs to be corrected or updated.

14. CHANGES TO THE NOTICE

Any changes to this notice will be published on the website and, in case of material changes, we may inform you about such via email.

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