

Privacy Notice for Wizz MultiPass users

Short Privacy Notice for Wizz MultiPass users

The purpose of this short Privacy Notice ("Privacy Notice") is to provide you basic information about how we process your data in connection with your use of Wizz Multipass. The Privacy Notice helps you to better understand how we use your personal data and explains how we collect, what we use it for and with whom it is shared. For further information about Wizz Air Hungary's data processing activities in general, please visit our [Full Privacy Notice](#).

Joint Data Controllers and Wizz Air's Data Protection Officer

WIZZ Air Hungary Ltd. (seat: Laurus Offices, Kőér street 2/A, Building B, H-1103, Budapest, Hungary; "Wizz Air") and **Changeyourflight, S.L.** (seat: Carrer de la Diputacio 303, 08009 Barcelona, Spain; 'Changeyourflight'; Wizz Air and Changeyourflight hereinafter jointly referred to as 'Controllers' or 'us') operate as joint data controllers when processing your personal data in connection with your use of the Website.

Wizz Air has appointed a data protection officer whose contact details you may find at the relevant section in the Full Privacy Notice.

Purposes and Legal Basis for Processing Your Personal Data

If you visit our website and subscribe to the Wizz MultiPass service, then we will process your personal data to provide you with our services and for the additional purposes identified below.

We need the personal data relative to subscription service provision and management to perform the [Wizz MultiPass Terms & Conditions](#) and provide you with our services. If you do not provide us with the requested personal data, we will not be able to provide you with all or parts of the services you have requested from us.

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining all conditions relating to the new processing prior to the new processing takes place. If required, we will seek your consent before commencing the new data processing activity.

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| 1. | Subscription service provision and management: processing your personal data is necessary to conclude and fulfil the Wizz MultiPass Terms & Conditions to allow for you to subscribe to the Wizz MultiPass service, to manage your subscription, to make your flight bookings and in order to allow for the processing of payments. In case you are a business contact person, we rely on our legitimate interest to process your personal data for the above purpose. |
| 2. | Marketing communications and newsletters: to carry out customer satisfaction surveys for analytical purposes, for quality improvements, for service developments, to improve the performance of the website, to measure the success of our advertising campaigns or to tailor services to your needs or send you newsletters on the contact channel of your choice we rely on your consent. |
| 3. | Security and operational safety: to perform support administrative tasks, anti-fraud screening, for safety, operational and other reports and security purposes we rely on our prevailing legitimate interests, and it is in our duty to fulfil related legal obligations. |
| 4. | Secure legal compliance: to comply with the mandatory provisions of the applicable laws such as accounting, billing, audit purposes, consumer protection, immigration or public health related purposes. |
| 5. | Provide Customer Care services: the purpose of processing your personal data is to manage your questions and inquiries to us. Calls made with our Customer Care are recorded for the protection and reproducibility of verbal commitments if you give your consent to that and they may be connected with other reservation data. We manage and archive your complaints and inquiries based on our legitimate interest. Complaints submitted electronically, via post or via email, are also archived, and may be connected with other reservation data for possible future complaints handling. |

Who May Have Access to Your Personal Data?

Only those authorized persons and departments within the Controllers have access to your personal data on a "need-to-know" basis. We may engage other persons, third parties as data processors to provide services to us and courts, government bodies or other authorities may require us to disclose your data them and also, we may transfer your personal data outside the EU/EEA by applying the appropriate safeguards.

Your Rights

You have the right to access, rectify or delete your data, as well as, on certain occasions, to object to the use of your data, in addition to other rights, and you have the right to data portability as detailed in the full Privacy Notice.

When the processing of your personal data is based on your consent, you can withdraw your consent at any time without giving any reason to us, free of charge. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you withdraw your consent or do not provide the consent for the use of your sensitive data, we may not be able to provide all or parts of the services you have requested from us. Please note that in these circumstances you will not be able to cancel or obtain a refund of any fees you have paid.

You have the right to object to the processing of your personal data for any reason relating to your situation, and in this case, we may not be able to process your personal data and provide our services.

Should you wish to exercise your rights below, we kindly ask you to contact Wizz Air, as the designated contact point for inquiries in the first instance. If you would like to exercise your data protection related rights, you can submit your request [HERE](#) after logging in into your Wizz account under the data protection tab. Otherwise, if you do not have a Wizz account, you can contact us by submitting your request [HERE](#).

You always have the right to make a data protection related complaint at any time to the competent supervisory authority of your place of residence.

Full Privacy Notice

For more information, please refer to our Full Privacy Notice for Wizz MultiPass users.

Full Privacy Notice for Wizz MultiPass users

The purpose of this Full Privacy Notice ("Privacy Notice") is to provide you detailed information about how we process your data in connection with your use of the Wizz MultiPass. The Privacy Notice helps you to better understand how we use your personal data and explains how we collect it, what we use it for and with whom it is shared. For further information about Wizz Air Hungary's data processing activities in general, please visit our [Full Privacy Notice](#).

JOINT DATA CONTROLLERS	<p>WIZZ Air Hungary Ltd. (seat: Laurus Offices, Kóér street 2/A, Building B, H-1103, Budapest, Hungary; "Wizz Air") and Changeyourflight, S.L. (seat: Carrer de la Diputacio 303, 08009 Barcelona, Spain; "Changeyourflight"; Wizz Air and Changeyourflight hereinafter jointly referred to as 'Controllers', 'we' or 'us') operate as joint data controllers when processing your personal data in connection with your use of the Website.</p> <p>Wizz Air and Changeyourflight have entered into a joint controller agreement which sets out our respective roles and responsibilities. Wizz Air is the main point of contact and responsible for taking care of your privacy related requests, queries or complaints. Irrespective of the terms of the arrangement, you may exercise your rights in respect of and against each of the joint data controllers, Wizz Air is also responsible for providing you with information in relation to this processing (as set out in this Privacy Notice) and notifying the relevant supervisory authority in the event of a data breach. If you need more details regarding the joint controller arrangement, please contact us at data.protection@wizzair.com.</p>
WHAT IS THE PURPOSE OF PROCESSING THE DATA?	<p>We will use your data for the purposes below:</p> <ol style="list-style-type: none"> 1) Subscription service provision and management: we process your personal data to fulfil the Wizz MultiPass Terms & Conditions, especially in order to allow for you to subscribe to the Wizz MultiPass service, to manage your subscription, to make your flight bookings and in order to allow for the processing of payments. 2) Marketing communications and newsletters: the purposes of processing your personal data relative to marketing communications and newsletters are to carry out customer satisfaction surveys for analytical purposes, for quality improvements, for service developments, to improve the performance of the website, to measure the success of our advertising campaigns or to tailor services to your needs or send you newsletters on the contact channel of your choice. 3) Security and operational safety: we may process your personal data to perform and support administrative tasks, anti-fraud screening, for safety, operational and other reports and security purposes. 4) Secure legal compliance: to comply with the mandatory provisions of the applicable laws such as accounting, billing, audit purposes, consumer protection related purposes. <p>For the purpose of legal compliance, we may pursue especially the below sub-purposes:</p> <ul style="list-style-type: none"> o Processing your data relative to the exercise of your data protection rights; o Processing your data in legal proceedings related to you; o Processing your data relative to the exercise of your consumer rights and relative to securing compliance with the related consumer protection laws; o Processing your data relative to securing compliance with accounting laws, securing accounting discipline and retain accounting documents; o Processing your data relative to securing compliance with tax laws, especially relative to issuing and retaining invoices. 5) Provide Customer Care services: the purpose of processing your personal data is to manage your questions and inquiries to us. <p>Calls made with our Customer Care are recorded for the protection and reproducibility of verbal commitments if you give your consent to that and they may be connected with other reservation data. Complaints submitted electronically, via post or via email, are also archived, and may be connected with other reservation data for possible future complaints handling.</p> <p>If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining all conditions relating to the new processing prior to the new processing takes place. If required, we will seek your consent before commencing the new data processing activity.</p>
WHAT PERSONAL DATA WE PROCESS ABOUT YOU?	<p>For the purposes outlined above we process the data categories indicated below:</p> <ol style="list-style-type: none"> A. Passenger Name Record (PNR) Data: including passenger birth date, passenger gender, passenger name, passenger nationality, passenger resident country, passenger travel document expiry, passenger travel document id, passenger travel document issuing country, passenger travel document type, customer name, customer nationality, customer phone. B. Service Provision Related Data: including subscription related information, passenger name, nationality, gender, age group, passport or Government issued EU National ID card numbers and expiry date, the special service request code (SSR) for passengers who have requested special assistance or service, provided amenities, phone number, email address, credit or bank card or bank account details, flight details, confirmation number, date of birth, details of travel documents, destination, rush bag tag number, description and value of the baggage, baggage tag number, reservation code, signature, cancelled/delayed flight number, booking reference, new flight number, the services you purchased and WIZZ Account number.

	<p>C. Direct Marketing Communication Data: including name and contact details (phone number, e-mail address), historic booking details and if you have any unfinished booking then the selected starting point and destination, one-way or return flight, departure and arrival times, number of passengers, selected fare type, total amount of fare price, whether the user is a newsletter subscriber, booking type (normal, WIZZ Discount Club, group), selected services, language of the site/Wizz Air application.</p> <p>D. Security and Operational Safety Data: including passenger name, address, phone number, IP address, geolocation data, booking and transaction history, credit/debit card details, claim and complaint related data.</p> <p>E. Compliance Data: including data related to persons requesting special assistance; personal data related to our obligations in case of flight disruption or flight delay, correspondence with the complainant.</p> <p>F. Tax and Accounting Data: including custom control related data, personal data related to invoicing, personal data related to paying applicable taxes and the related documents to secure compliance with applicable accounting and tax laws.</p> <p>G. Customer Care Data: including name, address, date of birth, e-mail address, telephone number, WIZZ account number, government ID, flight history, content of the request, correspondence with the complainant, payment and credit card data.</p> <p>Please be aware that if we need to perform a contract between you and us or provide you with our services or personalized offers, we will need your personal data. If you do not provide us with the requested personal data, we will not be able to provide you with all or parts of the services you have requested from us.</p>																		
<p>THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA</p>	<p>To process your personal data, we may rely on the legal bases below:</p> <ul style="list-style-type: none"> Your consent provided to us under Article 6 (1) a) of the EU Regulation 679/2016 ("GDPR") ("Consent"). The processing of your personal data is necessary for the performance of a contract with you under Article 6 (1) b) GDPR ("Contractual Basis"). The processing of your personal data is possible based on either Wizz Air's, Changeyourflight's or both Controllers' legitimate interest under Article 6 (1) f) GDPR ("Legitimate Interest"). We may process your personal data based on our legal obligations pursuant to Article 6(1) (c) GDPR ("Legal Obligation"). <p>We may process your personal data for the purposes and legal bases indicated below:</p> <table border="1" data-bbox="416 1099 1385 1794"> <thead> <tr> <th>Purpose of data processing</th> <th>Categories of personal data processed</th> <th>Legal Basis</th> </tr> </thead> <tbody> <tr> <td>Subscription service provision and management</td> <td> <ul style="list-style-type: none"> Passenger Name Record (PNR) Data Service Provision Related Data Service Communication Data Third Party Services Data </td> <td>Contractual Basis Legitimate Interest</td> </tr> <tr> <td>Marketing communications and newsletters</td> <td> <ul style="list-style-type: none"> Third Party Services Data Direct Marketing Communication Data </td> <td>Consent Legitimate Interest</td> </tr> <tr> <td>Security and Operational Safety</td> <td> <ul style="list-style-type: none"> Security and Operational Safety Data </td> <td>Legitimate Interest</td> </tr> <tr> <td>Secure legal compliance</td> <td> <ul style="list-style-type: none"> Compliance Data Tax and Accounting Data </td> <td>Legitimate Interest Legal Obligation</td> </tr> <tr> <td>Provide Customer Care services</td> <td> <ul style="list-style-type: none"> Security and Operational Safety Data Compliance Data Tax and Accounting Data Customer Care Data </td> <td>Legitimate Interest</td> </tr> </tbody> </table>	Purpose of data processing	Categories of personal data processed	Legal Basis	Subscription service provision and management	<ul style="list-style-type: none"> Passenger Name Record (PNR) Data Service Provision Related Data Service Communication Data Third Party Services Data 	Contractual Basis Legitimate Interest	Marketing communications and newsletters	<ul style="list-style-type: none"> Third Party Services Data Direct Marketing Communication Data 	Consent Legitimate Interest	Security and Operational Safety	<ul style="list-style-type: none"> Security and Operational Safety Data 	Legitimate Interest	Secure legal compliance	<ul style="list-style-type: none"> Compliance Data Tax and Accounting Data 	Legitimate Interest Legal Obligation	Provide Customer Care services	<ul style="list-style-type: none"> Security and Operational Safety Data Compliance Data Tax and Accounting Data Customer Care Data 	Legitimate Interest
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<p>OUR LEGITIMATE INTERESTS</p>	<p>When we process your personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.</p> <p>We have conducted the balancing test to conclude our prevailing legitimate interests. We considered the extent to which your interests, rights and freedoms may be impacted by our data processing activities, as well as the organizational structure and operation of the Companies and the privacy</p>																		

guarantees provided by us. On this basis, we have concluded that our relevant data processing activities (as outlined below) do not disproportionately restrict your interests, personal rights and freedoms.

Processing activity	Balancing test
Subscription service provision and management	If you subscribe to the Wizz MultiPass service as a business contact person, we consider having a legitimate interest to maintain business communication with you to allow for the provision of the requested services. If a legal entity is the contracting party for the flight services, it is reasonable for you, as the relevant contact persons to expect that your data will be processed to provide the requested service.
Marketing communications and newsletters	We may have a legitimate interest to contact you in relation of carrying out customer satisfaction surveys for analytical purposes, for quality improvements, for service developments, to improve the performance of the website, to measure the success of our advertising campaigns or to tailor services to your needs or send you newsletters through the contact channel of your choice.
Security and Operational Safety	We have a legitimate interest to prevent and detect fraud of any kind that pose a threat to us or to our customers, our employees, business partners and their employees and to respond to legal process or requests for information issued by government authorities or other third parties. You may expect us to take compliance with the law and information security seriously and there is a public interest in ensuring that this is the case; harm could arise if we were not able to process data in this way and the wider community also benefit from this. For this reason, we may disclose unwanted security intrusion, unauthorized access, disclosure and acquisition of information, data and system breaches to authorities and courts and to respond to legal claims and requests from third persons.
Secure legal compliance	We have a legitimate interest in processing data for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
Provide Customer Care services	We have a legitimate interest in processing data to respond to our customers' questions, inquiries, and complaints because it is critical to engage with customers if they have queries to maintain their confidence in us. If you directly contact us with a question or complaint, it is reasonable for you to expect that your data will be processed to facilitate a response.

For more detailed information regarding our legitimate interests and the results of the balancing tests, please contact us at data.protection@wizzair.com.

We process your personal data for the time required consistent with the purposes set out in this Privacy Notice or for the period of limitation prescribed in the relevant laws.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Purpose of data processing	Retention Time
Subscription service provision and management	We keep your personal data for a period of 6 years from the fulfilment of the contract concluded with us in order to comply with applicable data retention laws. We need to keep your personal data relative to your flights (PNR) for 5 years, which data we pseudonymize after 6 months from your flight with us.
Marketing communications and newsletters	We store internet search data collected concerning you for four days. We process your personal data until your consent is withdrawn.
Security and Operational Safety	We keep your personal data for a period of 6 years from the fulfilment of the contract concluded with us in order to comply with applicable data retention laws. If a court or disciplinary procedure is initiated, then the personal data will be retained until the termination of the proceedings, including the duration of any possible remedy, which data thereafter, in the case of civil claims, will be deleted after the civil law statute of limitation runs.

	<p>Secure legal compliance</p>	<p>In the case of accounting documents, the retention period is 8 years from the closing of the financial year, in accordance with Section 169 of Act C of 2000 on Accounting.</p> <p>We keep taxation related personal data in line with Section 78(3) of the Act no. CL of 2017 (Act on the Order of Taxation) and Section 179 of the Act no. CXXVII of 2007 (Act on Value Added Tax) until the end of the 5th year from issuing the invoice relative to the service.</p> <p>If a court or disciplinary procedure is initiated, then the personal data will be retained until the termination of the proceedings, including the duration of any possible remedy, which data thereafter, in the case of civil claims, will be deleted after the civil law statute of limitation runs.</p>
<p>WHO MAY HAVE ACCESS TO YOUR DATA?</p>	<p>Provide Customer Care services</p>	<p>We keep your data in line with to Section 17/A of the Act no. CLV of 1997 (Consumer Protection Act) 3 years from the year when the complaint was made</p> <p>Controllers, in the course of our operation, may utilise the services of various data processors and external service providers to handle and process your personal data for specific purposes, on behalf of and in accordance with our instructions. In addition, under the applicable aviation laws Wizz Air is required to share your personal data with governmental bodies, authorities and other enforcement bodies.</p> <p>The transfer of your personal data outside of the European Economic Area is necessary to provide you with a service that you have requested, and your personal data may be accessed by Wizz Air Group members and data processors and service providers from countries that do not provide the same level of data protection as provided in the European Economic Area. We take appropriate measures, which in relation to the recipients of your personal data, is necessary to ensure an adequate level of protection as defined by the applicable data protection law, in particular through the application of the Standard Contractual Clauses issued by the European Commission or by a decision of the European Commission which states that the country in which the recipient of the transferred personal data provides an adequate level of data protection.</p> <p>If, in relation to data transfers abroad, an adequate level of protection of personal data cannot be ensured, then we shall request your express consent relating to any such data transfers abroad. Please note that such data transfers may be associated with certain risks, particularly that in the country of the data recipient, unauthorised third parties may also have unreasonable access to said data and you may not be able to exercise your data protection rights and/or your right to object against acts that may harm your personal data and your right to privacy.</p> <p>On the Website among the origins and destinations, you can find the third countries where your personal data may be transferred, or where it may be accessed from, based on your travel destination and the service providers we use to perform our services.</p> <p>We may disclose your personal data to the following categories of third parties (recipients) for the purposes described below:</p> <ul style="list-style-type: none"> • Wizz Air Group: your personal data may be shared within the Wizz Air Group as far as such is necessary to provide the services you have purchased from us or to facilitate the purchase of third parties' services or products on our website, via our mobile application or through our call centre. For more information about Wizz Air Group, please click here. • Service Providers: we engage certain third parties to provide assistance during the performance of the services bought from us. Such third parties provide the following services: <ul style="list-style-type: none"> • payment processing services; • running loyalty schemes; • marketing agencies; • provision of IT support services; • accounting firms; • provision of customer care services; • other third parties, such as law firms or service providers; • Government authorities and enforcement bodies: government authorities or enforcement bodies such as the police and regulatory authorities, upon their request and only as required by the applicable law or to protect our rights or the safety of our customers, staff and assets. <p>We may transfer your personal data to government authorities or enforcement bodies such as the police and regulatory authorities, upon their request and only as required by applicable law; or to protect our rights or the safety of our customers, staff and assets.</p> <ul style="list-style-type: none"> • Border police and immigration authorities: In certain countries, Wizz Air is required by law to give border control agencies access to booking and travel information. Therefore, any information we hold about you and your travel arrangements may be disclosed to the customs and immigration authorities of your place of departure or your destination or to the local Passenger Information Unit. In addition, applicable laws in certain countries require Wizz Air to collect passport and associated information for all passengers prior to travel to or from those countries. When required by applicable law, Wizz Air will provide this information to the relevant customs and immigration authorities.

	<p>Please be informed that under Directive (EU) 2016/681 of the European Parliament and of the Council of 27 April 2016 on the use of passenger name record (PNR) data for the prevention, detection, investigation and prosecution of terrorist offences and serious crime Wizz Air is obliged to forward your travel information for the Passenger Information Unit of the Member State where you are travelling to.</p>
<p>YOUR RIGHTS</p>	<p>You are entitled to exercise your rights indicated below:</p> <p>(i) Right of access: You have a right to ask whether we process personal data about you and, if that is the case, request information on what personal data we have. We will also have to respond to questions about inter alia why we are using your personal data, details about what data we have and to whom we have provided access to the data. Please note that this is not an absolute right and the interests of other individuals may restrict your access rights.</p> <p>We may request additional information from you for identification or for further copies requested by you, we may charge a reasonable fee based on administrative costs.</p> <p>(ii) Right to rectification: We are required to rectify inaccurate personal data, or to complete personal data that is incomplete, on your request.</p> <p>For more information in relation to Wizz Air's rules of name change correction, please click here.</p> <p>(iii) Right to erasure (right to be forgotten): We are in some circumstances required to erase your personal data on your request.</p> <p>(iv) Right to restriction of processing: We are in some circumstances required to restrict our use of personal data on your request. In such cases, we may only use the data for certain limited purposes set out by the law.</p> <p>(v) Right to data portability: You may have the right to receive your personal data to which we have access, in a structured, commonly used and machine-readable format and you may then have a right to transmit those data to another entity without hindrance from us.</p> <p>(vi) Right to object:</p> <div data-bbox="416 936 1385 1070" style="background-color: #e91e63; color: white; padding: 5px;"> <p>You have the right to object to the processing of your personal data for any reason relating to your situation, and in this case, we may not be able to process your personal information. If you have the right to object and the exercise of this right is justified, your personal data in concern will not be further processed for the purposes of the objection. The exercise of this right does not entail any costs.</p> </div> <p>If you would like to exercise your data protection related rights, we kindly ask you to contact Wizz Air in the first instance either via our contact details you may find in the 'Data Protection Officer' section, or you may submit your request HERE after logging in into your Wizz account under the data protection tab. If you do not have a Wizz account, you can contact us by submitting your request HERE.</p> <p>If you believe that your privacy and data protection rights have been infringed, you have the right to submit a complaint with the Hungarian National Data Protection and Freedom of Information Agency (Nemzeti Adatvédelmi és Információszabadság Hatóság – NAIH; seat: H-1024 Budapest, Falk Miksa str. 9-11.; website: www.naih.hu; phone: +36-1-391-1400; email address: ugyfelszolgalat@naih.hu; fax: +36 1 391 1410) concerning the data protection activities of Wizz Air.</p> <p>You also have the right to file a complaint with the Spanish Agencia Española de Protección de Datos (seat: C/Jorge Juan, 6, 28001 Madrid; website: https://www.aepd.es/; phone: +34 91 266 3517; email address: internacional@aepd.es; fax: +34 91 455 5699) concerning the data protection activities of Changeyourflight.</p> <p>You may also contact the competent data protection regulatory authority located in the European Union's relevant Member State where your habitual residence, place of work or place of the alleged infringement is.</p> <p>If you are a resident of the United Kingdom, you may contact the Information Commissioner's Office (address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; telephone: 0303 123 1113; fax: 01625 524510; live chat: https://ico.org.uk/global/contact-us/live-chat/live-chat-individuals/) if you believe that your data protection rights have been infringed.</p>
<p>DATA PROTECTION OFFICER</p>	<p>If you have any further questions about the Privacy Notice or how we handle your personal data please contact us by sending your query to us through our webform by clicking HERE or via letter or email to the Data Protection Officer of Wizz Air (Wizz Air Hungary Ltd., Laurus Offices, Kőér street 2/A, Building B, II-V., H-1103 Budapest and / or data.protection@wizzair.com).</p>