# **Chatbot Privacy Notice**

(Last updated: 19 February 2025)

The purpose of this Privacy Notice ("**Privacy Notice**") is to provide you detailed information about how Wizz Air group companies process your data about how you use our chatbot.

Please avoid entering unnecessary personal data when using our chatbot. This helps protect your privacy and that of third parties while ensuring compliance with data protection regulations.

	<b>WIZZ Air Hungary Ltd.</b> (seat: Lechner Ödön fasor 6., H-1095, Budapest, Hungary)
DATA CONTROLLER	Wizz Air UK Limited (seat: Percival House 134 Percival Way, London Luton Airport Roundabout, Luton, United Kingdom, LU2 9NU)
	Wizz Air Abu Dhabi LLC. (seat: Business Park 01, Plot P6, Office number 208, Abu Dhabi International Airport, Abu Dhabi, United Arab Emirates)
	Wizz Air Malta Limited (seat: Skyparks Business Centre, Level 2, Malta International Airport, LQA4000. Luqa, Malta)
	(each: "Wizz Air", "we", "our" or "us", together as "Wizz Air Group Companies")
	Each Wizz Air entity is treated as an individual data controller, meaning that each entity independently determines how and why personal data is processed. However, in some situations, multiple Wizz Air entities may collectively determine the purposes and means of processing personal data, thereby acting as joint data controllers. These instances are described in detail in the "Joint Controllers" section of this Privacy Notice.
	Our Website may contain links to third party websites. These linked websites are not under our control and are regulated by their own privacy policies. We are not responsible for the privacy practices of any such linked websites. Our Website use cookies and similar technologies. For more information read our <a href="Cookie Policy">Cookie Policy</a> .
DATA PROTECTION OFFICER	To oversee and ensure adherence to applicable data protection laws across the organization, Wizz Air has appointed a Group Data Protection Officer. This role involves coordinating data protection efforts and ensuring that all entities comply with relevant regulations.
	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 <a href="here">here</a> or by writing to our Data Protection Officer at Wizz Air Hungary Ltd., Lechner Ödön fasor 6., H-1095 Budapest (or <a href="mailto:data.protection@wizzair.com">data.protection@wizzair.com</a> ).
EU/UK REPRESENTATIVE	Considering its data processing activities Wizz Air UK Limited and Wizz Air Abu Dhabi LLC is subject to the GDPR and accordingly appointed Wizz Air Hungary Ltd. (seat: Lechner Ödön fasor 6., H-1095, Budapest, Hungary) as its EU representative.
	Considering their data processing activities Wizz Air Hungary Ltd. and Wizz Air Malta Limited are subjects to the UK GDPR and accordingly appointed Wizz Air UK Limited (seat: Main Terminal Building, London Luton Airport, Luton, United Kingdom, LU2 9LY) as their UK representative.
	In relation to the chatbot's activities], the Wizz Air Group Companies are considered as joint data controllers.
JOINT CONTROLLERS	The Wizz Air Group companies have signed a joint controller arrangement, which sets out their roles and responsibilities, in order to enable the exchange personal data in compliance with applicable laws. Wizz Air Hungary Ltd is responsible for taking care of your privacy related questions, queries or complaints. You can also

contact our Data Protection Officer directly, if you wish. 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 Hungary Ltd. 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 personal data breach. If you need more details regarding the joint controller arrangement, please contact us at <a href="mailto:data.protection@wizzair.com">data.protection@wizzair.com</a>.

Purpose of the data processing	Legal basis of the data processing	Categories of data processed	Data retention time
Operation of the Wizz Air Chatbot ("Amelia")  Our Artificial Intelligence-powered chatbot automates interactions using both simple and complex pre-programmed "flows". For example, if you ask, "When does my flight take off?", the system will recognize your intent and trigger the relevant response. If no specific "flow" is identified, the chatbot will use AI to search internal resources (e.g., FAQs, Contact Us, GTC) and provide relevant information. In any case, it is possible to request talking to a human agent.  Please note that Artificial Intelligence -generated responses may not always be accurate, as the technology is continuously improving.  The chatbot also operates on the Messenger platform of Meta Platforms Ireland Limited (seat: Merrion Road Dublin 4 D04 X2K5 Ireland- "Meta"). In such case, Wizz Air and Meta act as joint controllers when processing your data through the chatbot. For details on this arrangement, see the Meta Controller Addendum. Meta processes and shares your personal data in accordance with its Privacy Policy.	is necessary to respond to your queries and requests to us, pursuant to Article 6(1)(b) of the GDPR.  If you contact Wizz Air with a question or complaint, providing your personal data is voluntary, but your data must be processed to facilitate a response.  If you have any further questions about how Meta processes your data, you may:  1. Contact Meta online; 2. Contact Meta's Data Protection Officer online; or	and payment or credit card data, and any actions or measures taken as a result of your use of the chatbot.  If necessary for the purposes outlined in this Privacy Notice, Wizz Air may combine this data with other personal data it already processes (e.g. previous queries or complaints submitted electronically, by post, email, or phone).	Wizz Air may store the personal data collected during your interaction with the chatbot for up to three years; if you use the chatbot on the Messenger platform, then for up to one year.  Meta will store your personal data in accordance with its Privacy Policy.

We disclose your personal data to the following categories of recipients for the purposes described below:

Wizz Air Group: Wizz Air Group companies exchange certain information internally at different group levels (e.g. worldwide, regional, and local) for different purposes (e.g. for flight administration, intra-group communication, customer and business partner administration). For example, we share your personal data 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.

Such an exchange of information involves Intra-Group Data Transfers of personal data between Wizz Air Group entities located in different countries inside and outside the European Union / European Economic Area (EU/EEA).

For more information about Wizz Air Group, please click here.

 Wizz Air Service Providers: Wizz Air engages certain third parties to provide assistance during the operation of the chatbot. Such third parties provide the following services:

## Metis Solutions, S.L.

C/Roc Boronat 117, 2, 08018 Barcelona, Spain Chatbot development and operation

#### Laive

131, avenue Parmentier, 75011 Paris, France Chatbot development and operation on the Messenger platform.

### **Amazon Web Services (AWS)**

38 Avenue John F. Kennedy, L- 1855 Luxemburg data storage and cloud services

#### DeepL GmbH

Maarweg 165, 50825 Köln, Germany translation services Fax: +49 221 95018653 info@deepl.com

#### Google Ireland Ltd.

Google Building, Gordon House, Barrow Street, Dublin 4, Ireland translation services

Phone: <u>+353 1 436 1000</u>

#### salesforce.com EMEA Limited

Floor 26 Salesforce Tower, 110 Bishopsgate EC2N 4AY London, United Kingdom

CRM and LiveChat functions Phone: (+44) 800 086 8530

 Government authorities and enforcement bodies: We 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.

TRANSFER OF YOUR

The transfer of your personal data outside of the European Economic Area (and, in respect of personal data originating in the UK, outside of the UK) is necessary

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WHO MAY ACCESS TO YOUR DATA? PERSONAL
DATA OUTSIDE
OF THE
EUROPEAN
ECONOMIC
AREA AND THE
UK

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 UK/European Economic Area. Wizz Air takes 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 <u>Standard Contractual Clauses</u> or by an adequacy decision of the European Commission (or for personal data originating in the UK, an adequacy decision of the UK Secretary of State) which states that the country in which the recipient of the transferred personal data provides an adequate level of data protection. <u>Standard Contractual Clauses</u> applied by Wizz Air are available upon request if you reach out to us via email at data.protection@wizzair.com.

AWS is operated by Amazon Web Services EMEA SARL (38 Avenue John F. Kennedy, L-1855, Luxembourg; fax: 352 2789 0057; AWS Support and Customer Service Contact Info | Amazon Web Services), the affiliated company of Amazon Web Services, Inc. Amazon Web Services, Inc. is located in the USA, and its affiliated companies are located throughout the world. Depending on the scope of the interactions with AWS offerings, personal data may be stored in or accessed from multiple countries, including the USA. The data protection legislation of most non-European Economic Area (EEA) countries (including the USA) does not provide an adequate level of data protection as defined by the GDPR. Whenever AWS transfers personal data to other jurisdictions, it will ensure that the information transferred accordance with its Privacy Notice in (https://aws.amazon.com/privacy/?nc1=f pr) and as permitted by applicable data protection laws.

For this purpose, the relevant AWS <u>Service Terms</u> incorporate the standard data transfer agreements (Standard Contractual Clauses between controllers and processors ("<u>Controller-to-Processor Clauses</u>") and Standard Contractual Clauses between processors ("<u>Processor-to-Processor Clauses</u>") approved by the European Commission Implementing Decision (EU) 2021/914 of 4 June 2021 (the "**SCCs**"). In the USA, Amazon Web Services, Inc. participates in the <u>EU-US Data Privacy Framework</u>, which is established by the European Commission and the U.S. Department of Commerce and provides a mechanism for companies in the EEA to transfer personal data to the USA while ensuring a level of protection equivalent to EU data protection standards.

You are entitled to exercise your rights indicated below:

# YOUR DATA PROTECTION RIGHTS

- (i) Right of access: You have the right to request confirmation from us about whether we are processing your personal data. If we are, you can access the following information: the purposes, types of data, recipients of your data (including those in other countries or international organizations), how long your data will be stored, and your rights to rectify, erase, or restrict processing. You can also learn about the source of your data, automated decision-making (if applicable), and any safeguards in place for international transfers. You can request a copy of your data, with additional copies subject to a reasonable fee.
- (ii) Right to rectification: We are required to rectify inaccurate personal data, or to complete personal data that is incomplete. For more information in relation to our rules of name change correction, please click <a href="here">here</a>.
- (iii) Right to erasure (right to be forgotten): We are in some circumstances required to erase personal data on request by the data subject. This may be the case if you withdraw your consent to Wizz Air sending you marketing communications and newsletters. This may also be the case if you object to the processing of your personal data for any reason relating to your situation, and we may not be able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or we may not continue processing

your personal data with the purpose of establishing, exercising or defending legal claims.

- (iv) Right to restriction of processing: We are in some circumstances required to restrict our use of personal data on request by the person concerned. In such cases, we may only use the data for certain limited purposes set out by the law. This may be the case if you contest the accuracy of your personal data processed by Wizz Air, for a period enabling Wizz Air to verify the accuracy of your personal data. This may also be the case if you have objected to the processing of your personal data, pending the verification whether Wizz Air may continue processing your personal data with the purpose of establishing, exercising or defending legal claims.
- (v) <u>Right to data portability:</u> You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where: (a) the processing is based on consent or on a contract, and the processing is carried out by automated means. In exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

#### (vi) Right to object:

You have the right to object to the processing of your personal data, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interest. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

When the processing of your personal data is based on your consent (e.g. in case of Wizz Air sending marketing communications and newsletters), 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 explicit consent or do not provide the explicit consent for the use of your special categories of personal data, as outlined in this Privacy Notice, 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.

### HOW TO SUBMIT DATA PROTECTION REQUESTS

If you would like to exercise your data protection related rights, you can submit your request to <a href="mailto:data.protection@wizzair.com">data.protection@wizzair.com</a> or after logging in into your Wizz Account under <a href="mailto:HERE">HERE</a>.

CONTACTING
DATA
PROTECTION
AUTHORITIES

If you consider that your privacy and data protection rights have been infringed, you may contact the competent data protection authority.

In case of Wizz Air Hungary the Hungarian National Data Protection and Freedom of Information Agency (Nemzeti Adatvédelmi és Információszabadság Hatóság – NAIH; seat: H-1055 Budapest, Falk Miksa u. 9-11.; website: <a href="www.naih.hu">www.naih.hu</a>; phone: +36-1-391-1400; email address: <a href="www.naih.hu">ugyfelszolgalat@naih.hu</a>; fax: +36 1 391 1410) is the lead supervisory authority under the GDPR.

You can 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. The contact details of supervisory authorities within the EU can be found here: <a href="https://edpb.europa.eu/about-edpb/about-edpb/members">https://edpb.europa.eu/about-edpb/members</a> en.

The Information Commissioner's Office (ICO) is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data in connection with UK GDPR. The ICO can be contacted by phone: 0303 123 1113; or post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.