

# Brussels Airport Company

## Marketplace privacy policy

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### 1. Introduction

Brussels Airport Company NV (hereinafter: "Brussels Airport") highly values your privacy and aims to protect your personal data in accordance with (i) the General Data Protection Regulation of 25 May 2018, (ii) the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data and (iii) [Brussels Airport's Privacy Policy](#).

As part of the Marketplace, Brussels Airport processes certain personal data. The types of personal data being processed as part of the Marketplace and the conditions under which such personal data are being processed, are further clarified in this Marketplace Privacy Policy. The conditions of this Marketplace Privacy Policy apply in addition to the Brussels Airport's Privacy Policy. In the event of any inconsistency between Brussels Airport's Privacy Policy and the Marketplace Privacy Policy, the terms of the Marketplace Privacy Policy will take precedence. Any capitalised terms not defined herein shall have the meaning ascribed to them in the [Brussels Airport Privacy Policy](#) or the [Terms of Use of the Marketplace](#).

### 2. Processing of personal data under the Marketplace

The Marketplace is a publicly available online trading platform. Any User can visit the Marketplace without being required to identify itself (a "**Visitors**"). However, in order to acquire Products and/or Services through the Marketplace, Users will be required to identify themselves on the Marketplace. Users can either acquire Products and/Services by creating an account on the Marketplace ("**Registered Users**") or by just providing certain personal data to Brussels Airport without creating an account on the Marketplace ("**Non-Registered Users**").

#### 2.1. Visitors

When you are only visiting the Marketplace without acquiring any Products and/or Services, Brussels Airport will process certain of your personal data. Such personal data will be processed regardless of whether you are a Visitor, Registered User or a Non-Registered User.

a) Type of personal data

- **Behavioral Information:** such information relates among others to information regarding the manner in which Users are using the Marketplace (i.e. browsertype, domains, page displays) which is collected via cookies and other automated technologies (see [Cookie Policy](#) for more information);
- **Electronic Identification Data:** such information relates to IP addresses (i.e. the unique sequence of numbers that identify each device connected to a network (i.e. laptop, tablet, smartphone) with which the communication and exchange of information with other devices on an IP based network, such as the Internet, is made possible);
- **Location data:** location data (based on your IP address).

b) Purposes

- **Electronic Identification Data and Location Data:** are processed for (i) providing access to and participation in the Marketplace and using the Marketplace; (ii) exploiting, evaluating and improving the Marketplace (including developing additional products and / or services, analyzing the Marketplace and quality control activities), diagnosing technical problems and managing technical support and processing questions related to the Marketplace; (iii) protecting against, identifying and preventing fraud and other illegal activity, claims and other liabilities, (iv) commercialising the Marketplace.
- **Behavioral information:** is processed for the purpose of (i) exploiting, evaluating and improving the Marketplace (including developing additional products and / or services, analyzing the Marketplace and quality control activities), diagnosing technical problems and managing technical support and processing questions related to the Marketplace; (iii) commercialising the Marketplace.

c) Retention Period

Behavioral Information, Electronic Identification Data and Location data will be processed during the retention period set forth in Article 9 of <https://www.brusselsairport.be/en/privacy-policy>

## 2.2. Registered Users

a) Type of personal data

Brussels Airport may process the following personal data of Registered Users:

- **Personal Identification Information:** your e-mail address, name and surname

- **Account Information:** your login credentials and password for your Marketplace account,
- **Flight Information:** your flight data including flight number, departure and destination airports and flight date as provided by you as part of your order
- **Payment Information:** Name of the card holder, (credit/debit) card number, validity date of the payment card and CVC number (card verification code)
- **Optional Data:** as to facilitate contact in case of problems with your order on the Marketplace, Brussels Airport may request you to provide the following information: sex, country, postal code and mobile number

#### b) Purposes

- **Personal Identification Information and Account information:** these personal data are processed for (i) identification purposes, (ii) the management of your account on the Marketplace, (iii) the performance of your agreement with Brussels Airport and, as the case may be, the Seller, (iv) compliance with Brussels Airport's legal obligations and (v) facilitating communications between the User, Brussels Airport and, as the case may be, the Seller.
- **Flight Information and Payment Information:** these personal data are processed for (i) the performance of the agreement for the acquisition of Products and/or Services on the Marketplace and (ii) compliance with legal obligations.

#### c) Retention Period

Personal Identification Information, Account information, Flight Information and Payment Information will be retained for a period of maximum 3 years following your latest activity on your Marketplace account. After expiration of this term, all such information will be made anonymous.

## 2.3. Non-Registered Users

#### a) Type of personal data

Brussels Airport may process the following personal data of Non-Registered Users:

- **Personal Identification Information:** your e-mail address, name and surname
- **Flight Information:** your flight data including flight number, departure and destination airports and flight date as provided by you as part of your order
- **Payment Information:** Name of the card holder, (credit/debit) card number, validity date of the payment card and CVC number (card verification code)

- **Optional Data:** as to facilitate contact in case of problems with your order on the Marketplace, Brussels Airport may request you to provide the following information: sex, country, postal code and mobile number.

#### b) Purposes

- **Personal Identification Information and Account information:** these personal data are processed for (i) identification purposes, (ii) the management of your account on the Marketplace, (iii) the performance of your agreement with Brussels Airport and, as the case may be, the Seller, (iv) compliance with Brussels Airport's legal obligations and (v) facilitating communications between the User, Brussels Airport and, as the case may be, the Seller.
- **Flight Information and Payment Information:** these personal data are processed for (i) the performance of the agreement for the acquisition of Products and/or Services on the Marketplace and (ii) compliance with legal obligations.
- **Optional Data:** optional data will only be processed if they have been provided by you and in case of problems with regard to your order should occur

c) Retention Period Personal data of Non-Registered Users are retained for a period of 30 days following the completion of the order. Upon expiration of such term, such personal data will be anonymised in Brussels Airport's systems.

## 3. Sharing personal data as part of the Marketplace

### 3.1. Personal Data shared with 3rd Party Service Providers

In order to provide the Marketplace, Brussels Airport makes use of services offered by third party providers, including but not limited to IT providers providing hosting services, IT platforms, telecommunications services etc. You hereby agree that Brussels Airport is entitled to provide your personal data to such providers for the purposes of the Marketplace.

### 3.2. Personal Data shared with Sellers and pick-up point staff

When ordering a Product and/or Service on the Marketplace, Brussels Airport may need to share certain personal data to Sellers and pick-up point staff as to enable such Seller or pick-up point staff to provide the Product and/or Service to you. Such personal data relates to (i) Personal Identification Information, (ii) Flight Information and (iii) Optional Data.

### 3.3. Personal Data shared with Payment Services Providers

As to allow you to purchase Products and/or Services via the Marketplace, Brussels Airport makes use of a third party payment service provider such as Stripe. You hereby agree that Brussels Airport is entitled to transfer your Payment Information to such third party payment services provider. Such Payment Information will subsequently be processed in accordance with the privacy terms of the payment services provider. Stripe's privacy terms can be consulted [here](#). Nothing contained herein limits or prevents Brussels Airport from disclosing your personal data to the competent authorities further to the request of such competent authorities.

## 4. Your rights

As a Data Subject, you have a number of rights under applicable data protection laws. The specific rights that you have including the manner in which you can exercise these rights, are further specified in Brussels Airport's Privacy Policy. Unless to the extent expressly deviated herein, the processing of your personal data will take place in accordance with <https://www.brusselsairport.be/en/privacy-policy>