

Privacy policy of Happy Delay

This is the privacy policy of Happy Delay B.V., with its address at Kanaalweg 172, Utrecht, the Netherlands and registered with the Dutch Chamber of Commerce under number 71518835 (hereafter "Happy Delay", "we" or "us"), as most recently updated per 24-06-2018. This privacy policy also applies with respect to all companies in which Happy Delay directly or indirectly has a controlling interest.

In order to assist our clients in the best possible way, we request and process certain information from our clients.

We are dedicated to honoring the confidence that clients put into our company. Our privacy policy is applicable to all of our services. By using our website, you agree to our privacy policy.

Happy Delay respects your privacy and complies with all applicable EU directives regarding data privacy. All data provided to us shall be treated with the strictest confidentiality. Our employees are required to respect your personal data. This document explains which information we process and how we do that.

Why do we ask for your information?

When submitting your claim via our website, we ask you for certain information regarding your flight. We also ask for some personal information and documents. The information that we request is essential for us and certain other parties to assess the validity of your claim and to successfully collect your claim from the airline (e.g. during a Court procedure). Incidentally, we may also contact you using the contact details provided to us. We will never ask for more information than is strictly needed.

For these purposes, we, our employees and/or representatives, store, process and use your personal data, aiming to deliver the best possible service to you. Considering the global nature of our business and the fact that the same applies to the airlines that owe you / us money, our employees and representatives may be located in different countries. The same applies to the Third parties mentioned below. Therefore, you expressly consent that your personal information may be shared cross-border and possibly outside the EU.

Why we need your passport copy

The information requested from you includes a copy of your passport. Because our contact with you is (almost) exclusively by means of digital communication, a copy of your passport is the only way for us to validate your identity.

What you can do

Although we will protect all personal data provided to us, we can imagine that you want to create additional safeguards to ensure that your information is not misused. We encourage all our valued clients to take such additional measures to prevent unwanted use of a passport copy. Such measures can include:

- Striking through your social security number; and
- Inserting a transparent watermark stating (for example): *"Provided to Happy Delay in order to sell my claim"*, thereby making it more difficult for anyone to misuse your passport copy.

You can also use the KopieID app developed by the Dutch Ministry of Internal Affairs (also available in English). This app is specifically designed to securely share a copy of your passport and is available for Apple iOS and Android devices.

Third parties

We respect that your personal data is provided to us only. Therefore, your data will not be shared with third parties, except as specifically stated below. Your personal data may be shared:

- with a bailiff, a Court, the airline, representatives of the airline or any other parties involved during an (out
- of) Court procedure, if and to the extent such information is required to prove the validity of your claim;
- for purposes of obtaining funding from a third party to enable us to pay your claim amount to you or to obtain other means of funding, if and to the extent such information is reasonably required by that third party;
- with any third party if and to the extent required by law, a governmental or other authority with relevant powers to which Happy Delay is subject;
- after your specific prior approval.

Furthermore, we may use third party software to enable our service to you. At your request, we can provide you with more information in this regard.

Data retention period

We will not store your personal data longer than is strictly necessary and in compliance with the most recent EU directives regarding data privacy. We will erase your passport copy once we have received payment from the airline.

Cookies

Our website should be user-friendly. To do research regarding the user-friendliness of our website, we collect and store data to gain insight into the needs of our clients and to enable us to adapt our services to their needs. For that purpose, we use cookies. Cookies help us to analyze the use of our website and make it more efficient. Most browsers have as a default setting to accept cookies. If desired you can turn off this function, although some functions of our website may not function properly.

Our website uses Google Analytics. We have taken measures to ensure your privacy is safe while using this function. In particular, the last digits of your IP address will be shielded. "Data Sharing" has been turned off. We have entered into a processing agreement with Google and do not make use of other Google services in combination with the Google Analytics cookies.

Right to access and correct

You may at all times request Happy Delay to provide access to the personal data gathered about you via info@happydelay.com. If the email address on which you wish to receive such information deviates from the email address that you provided earlier via our website, we request you to provide a copy of your passport to confirm your identity. Based on the information received, you may request Happy Delay to change or delete your personal data.

Changes to privacy policy

Happy Delay reserves the right to change its privacy policy from time to time, provided that Happy Delay shall not do so retroactively without your prior approval. Such changes will be published on www.happydelay.com by way of an updated privacy policy.