

Overview

Your privacy is very important to us at Crewpass and we understand how important it is to you. We want you to feel safe when visiting our website or using our services and are committed to maintaining your privacy when you do. We require our employees, suppliers and partners to maintain confidentiality in accordance with applicable data protection laws.

This privacy notice (together with our Terms and Conditions and any other documents referred to herein) sets out the basis on which we process any personal data we collect from you, or that you provide to us ("Privacy Notice"). Please read the following carefully to understand our views and practices regarding your personal data.

This Privacy Notice can be changed over time to comply with law or to meet our changing business requirements. The most up-to-date Privacy Notice can be found on our website. We will inform you appropriately of any relevant changes to this Privacy Notice. Subject to applicable laws, the English version of this Privacy Notice will prevail over any version of this Privacy Notice in another language.

For the purposes of the General Data Protection Regulation, the Controller is Crewpass (Pty) Ltd, with its registered office at 27 Barrydale Road, Port Elizabeth, SOUTH AFRICA, 6070 (from now on referred to as "Crewpass", "we", or "us").

Crewpass has adopted an 'opt-in' policy where you can decide whether you would like to receive our newsletters and offers. You may submit a request to withdraw your consent at any time by contacting Crewpass.

What does this Privacy Policy apply to?

This Privacy Policy applies to your use of the Crewpass "Website" crewpass.app and the mobile application "App" offered under the name CrewPass, and all products and services that we offer you via our Website and App.

How do we collect and receive Personal Data?

Personal data

In this Privacy Policy, your "personal data" means information or pieces of information that could allow you to be identified as a person.

Your consent

Crewpass will not collect, use or disclose your personal data without your prior consent. Therefore, we ask you to agree to this Privacy Policy before you can use our Website or App. When disclosing your personal information to us by creating a CrewPass account on our Website or App, you consent to the collection, storage and processing of your personal information as stated in this Privacy Policy. You can withdraw your consent at any time.

CrewPass processes information obtained from yourself on the basis of your consent. Processing of your personal data is necessary for the performance of a contract or on the basis that the processing is necessary for the purposes of the legitimate interests of CrewPass. These legitimate interests are that the processing of the personal data is necessary for CrewPass to be able to identify you as a user on our platform.

Which personal data do we process?

CrewPass collects your personal data when you create or update your account necessary to complete CrewPass's online forms for the purpose of providing secure access to CrewPass, providing the user with relevant information, CrewPass development and security enforcement, payment processing and usage of all CrewPass provided services.

The mandatory personal data CrewPass collects are:

1. **Nominative Information:** Title, first name(s), surname(s): Your nominative details are needed to properly identify you, to communicate with you, to provide you with the products and services you have requested.
2. **Social media account:** If you log in using a social media account, your social media Unique Identification Number, first name, last name, profile image and friends list is stored to identify you, communicate with you and to aid verification of your account and secured access to CrewPass. Your friends list is only fetched if you log in using Facebook and after your consent. It will be deleted within 7 days after your account is approved or denied.
3. **Email address:** Electronic communication is for most purposes CrewPass's preferred method of communication because it is generally convenient, rapid, effective, environmental friendly and efficient. In order to be able to communicate with you directly electronically, CrewPass needs your email address. You are therefore required to supply your email address when you create your account on the Website or the App. Finally, it enables you to recover your password in case you forgot it in an automated, secure way.
4. **IP address:** Your last used IP address is stored to facilitate location-based services such as, but not limited to nearby cities and / or airports as well as general security against unauthorized access to your account.
5. **Airline:** Your current airline employer is stored to show open requests that you can answer.

In some cases, we ask you for additional information if this is needed for the services provided by CrewPass. For example, CrewPass processes payment information provided by you, if such information is necessary.

How do we use your Personal Data?

We use and process the personal data you have provided us with for the purposes described below:

- We use your social media profile link, email address and personal details to send you information and updates and to accept you as a user of the Website or the App. We may also send you information about topics that might be interesting for you. You can unsubscribe from these services at any time.
- In case we cannot identify you, we will ask for more detailed information such as proof of your employment by an airline company. We will erase this information directly after you have been identified by us.

- We use the data about your browser language, your IP address and geolocation in order to address you in a language you speak and to show you content that relates to the country you reside in.
- In case of fraud, we will share your personal data with the victim in order to allow this person to file a report with the police. We will not share more data than necessary for the report, and we will notify you in advance when we are about to share your data for this purpose.

Storage

If you are a CrewPass member, your information will be kept in our database while you continue to be a member, even if you do not use the CrewPass Website or App or services during that time, until you end your membership.

Personal information is only kept for a reasonable period of time, dependent upon the nature of the information and its intended use, but subject to a maximum of one month after you unsubscribe as a member. In all cases, accounts receivable records and invoices containing personal data are kept for the South African statutory retention period of five years.

Who do we share your personal data with?

CrewPass does not sell, trade, or rent personal data to third parties.

Third-party service providers

In order to render our services, there are data that we will need to share with third-party service providers.

Personal data are only shared with processors and/or third parties if this is necessary to carry out services for you.

All processors have guaranteed that they comply with the GDPR and have signed processing agreements with us.

Other third parties have no access to personal data.

For payments made via our Website or App, we use third-party services such as payment gateways and other payment transaction processors. These third parties are contractually obliged not to use said data for any other purpose than to effectuate the payment.

Payment required by law for administrative purposes will be shared with our accounts provider for the sole purpose of adhering to South African Tax and corporate laws.

Generic aggregated (non-personal) data

We may share generic aggregated data with our business partners, trusted affiliates and advertisers. In such case the data will be fully anonymized.

Generic aggregated data may be used to identify technical or development problems within the CrewPass Website, App or backend systems.

How do we keep your data safe?

Safeguards

CrewPass has taken adequate safeguards to ensure the confidentiality and security of your personal data. We are committed to ensuring that your Personal Data is secure. In an effort to prevent unauthorised access to, or disclosure of, your Personal Data, we have put in place physical, technical, and administrative safeguards to protect your Personal Data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing. In order to protect the security of your information, where necessary, we use encryption technology when collecting or transferring Personal Data.

Although we use reasonable and appropriate efforts to protect your Personal Data we cannot guarantee the security of your Personal Data transmitted to our Website or Mobile Apps via internet or similar connection.

Children

We do not intentionally gather Personal Data about children. We are not able to identify the age of persons who access and use our Website or Mobile Apps or subscribe to our newsletters. If you believe we have inadvertently collected Personal Data about your child or if the child has provided us with Personal Data without parental or guardian consent, the parent or guardian should contact us, and we will erase the Personal Data and where relevant unsubscribe the child.

Retention

We will retain Personal Data for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of CrewPass as described in this Privacy Notice and in line with our data retention policies, or as required by relevant laws.

When erasing Personal Data, we will take commercially reasonable and technically possible measures to make the Personal Data irrecoverable or irreproducible in accordance with the applicable laws.

Cookie Policy

We may use cookies to enhance your experience when you use our Website. A cookie is a small text file, containing a string of characters that can be placed on your device when you visit a website. This text file uniquely identifies your browser or device. When you visit our Website again, the cookie allows our Website to recognize your browser or device. You can change your cookie settings in your

browser, if you don't want cookies to be sent to your device. Please note that some Website features or services of our Website may not function properly without cookies.

We use the following types of cookies on our Website:

1. **Technical cookies:** These are cookies that are essential for the operation of our Website, they enable you to move around our Website and use our features.
2. **Analytical/statistical cookies:** We use these cookies to track visitor statistics. We use these statistics to continuously improve the Website and mailings, and thus offer you relevant content. These cookies also allow us to recognize and count the number of visitors and to see how visitors navigate when they're using our Website. This helps us to improve user navigation and ensure users to find what they need more easily.
3. **Tracking cookies:** These cookies monitor clicking behaviour and surfing habits. By means of these cookies we can see whether and when you view your profile, and whether you click through to our Website.

Third Party Websites

You may find advertising or other content on our Website that link to the websites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these websites and are not responsible for the practices employed by websites linked to or from our Website. In addition, these websites or services, including their content and links, may be constantly changing. These websites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites that are linked to our Website, are subject to the terms and policies of that website.

Modifications to this Privacy Policy

We can update our Privacy Policy from time to time. When we change this Privacy Policy in a significant way, we will post a notification on our Website along with the updated Privacy Policy. We may also notify you via your email address and request you to accept the updated Privacy Policy before you can continue your use of our App and Website.

Your rights and managing your Personal Data

In accordance with the POPI Act of South Africa, you have the right to request access to and rectification or erasure of your personal data and/or restriction of processing of your data and/or to object to the processing of your data on the basis of POPIA, as well as the right to data portability.

You can have access to your personal data by going to your account. Here, you can also adjust or delete your personal data. If you need help adjusting or deleting your personal data, or if you want to request a restriction of processing of your data, object to the processing of your data or if you

want to receive your data in a structured, commonly used and machine-readable format, you can also contact CrewPass by email (info@crewpass.app).

If you feel CrewPass is violating your rights, please contact us. You also have the right to file a complaint with the Information Regulator of South Africa (contact information can be found on <https://justice.gov.za/inforeg/contact.html>).

Contact us

If you have any questions, comments or concerns about how we handle your personal data, please feel free to contact us.

CrewPass (Pty) Ltd
27 Barrydale Road
Port Elizabeth
SOUTH AFRICA
6070

Or contact us at info@crewpass.app