

Travel ID Privacy Notice

October 2024

The purpose of this Travel ID Privacy Notice (referred to below as “**Privacy Notice**”) is for us to inform you about the processing of your personal data in connection with your use of Travel ID.

We, the airlines of the Lufthansa Group and Miles & More GmbH as the operators of Travel ID, would like to offer you our services within the Lufthansa Group in the most convenient way possible and provide you with a travel experience that is tailored to you and your particular wishes and expectations, reaching from your first visit to our website and other contact points through to the end of your trip and beyond. Travel ID gives you the option of creating a free customer profile that is valid for all Travel ID operators and with which you can access a wide range of services.

The creation of a Travel ID profile and provision of the data needed for this is voluntary. However, some of our services are available exclusively to our Travel ID customers. This applies, for example, to the option of receiving personalised flight offers and additional services on the booking platforms of the Lufthansa Group airlines.

This privacy statement is aligned with the applicable data protection regulations; depending on the scope of application, these include the GDPR, as well as any other legally provided national data protection laws and regulations.

Controllers under data protection law

The operators of Travel ID are Austrian Airlines AG, Brussels Airlines SA/NV, Deutsche Lufthansa AG, Eurowings GmbH, EW Discover GmbH and Swiss International Air Lines AG as the “Lufthansa Group airlines”, as well as Miles & More GmbH.

Unless otherwise stated in this Privacy Notice, “we” or “us” or “Travel ID operators” refers to the Lufthansa Group airlines and Miles & More GmbH as the controllers with joint responsibility (“Joint Controllers”) for the processing of your personal data as defined in Article 26 GDPR.

More information and contact addresses for the Lufthansa Group airlines and Miles & More GmbH can be found in the respective privacy policies of the Travel ID operators.

Who can you contact?

If you have any privacy-related questions in connection with Travel ID, please contact the following offices:
The data protection officer of **Deutsche Lufthansa AG, Miles & More GmbH, Eurowings GmbH and EW Discover GmbH**:

Deutsche Lufthansa AG
Data Protection Officer
FRA CJ/D
Lufthansa Aviation Center
Airportring
60546 Frankfurt/Main
Germany

Data protection officer of **Austrian Airlines AG:**

Austrian Airlines AG
Legal office – Data Protection
Office Park 2
Postbox 100
1300 Vienna Airport
Austria

Data protection officer of **Swiss International Air Lines AG:**

Swiss International Air Lines AG
ZRH S/CJ
Postfach
8058 Zurich Airport
Switzerland

Brussels Airlines SA/NV Data Protection Officer:

Brussels Airlines
Data Protection Officer
Airport Bld. 26, General Aviation - Ringbaan
1831 Machelen
Belgium

Creating a Travel ID profile

When you register for Travel ID, we ask for your email address, your title, your first and last names, your date of birth and a password as mandatory information. Your country and preferred language settings will be automatically transferred, as far as technically possible, using the country and language settings you entered on the respective websites or other contact points of the Travel ID operators. This information is required in order to create a Travel ID profile and to use the services described in detail in the Travel ID Terms and Conditions of Use. You are free to add further information to your Travel ID profile on a voluntary basis. This may include your address, mobile phone number, payment details or your preferences (e.g. your preferred departure airport).

Based on your activities that you linked in your Travel ID profile, we will display anonymous statistics to you (e.g. your position in the ranking of kilometres flown) and/or so-called badges (e.g. awards when you reach specific targets).

The consent of a parent or guardian is required if you wish to set up a Travel ID profile for your child or your child wishes to do so themselves, and the child is under 18 years of age. After submitting the completed registration form, the parent or guardian will receive an email in which they are asked to give their consent to the creation of a Travel ID profile by confirming the link in the email. All personal data entered is deleted if the parent or guardian does not give their consent within the specified deadline after registration.

The legal basis for the processing of your data is fulfilment of the contract in accordance with Art. 6(1)(b) GDPR.

You also have the option to save additional personal data in your Travel ID on the basis of your consent. You can find details in the relevant sections of this Privacy Notice.

Notifications about your Travel ID profile

If necessary to fulfil the contract, we will send you messages about status changes in your Travel ID profile. This includes, among other things, expiry of the validity of your travel documents, payment methods or password uploaded via your Travel ID profile.

If you have not logged into your Travel ID profile for three years, we will ask you to log in again. If we do not see any activity in your Travel ID profile within another six months, we will delete it (see paragraph “Deletion of your Travel ID profile”).

The legal basis for the processing of your data is fulfilment of the contract in accordance with Art. 6(1)(b) GDPR.

Personalised use of websites and other contact points

When you visit our websites, use our mobile apps and other touchpoints on the ground and on board, our aim is to make it easier and quicker for you to find and use the information that is relevant to you. You therefore have the option of registering there with your Travel ID and being contacted personally, for example receiving information that matches your current flight booking or your Miles & More membership.

If you do not wish to use the login service, you are, of course, free to use the website/contact points without logging in. In this case, the respective content will be displayed to you in a non-personalised manner.

The legal basis for the processing of your data is fulfilment of the contract in accordance with Art. 6(1)(b) GDPR.

Pre-populated forms

We use the data you enter in your Travel ID profile to make the booking process easier for you through pre-populated forms. This can be data you actively provided during registration or added at some later point, or data you gave as part of a previous booking in relation to your Travel ID and which we automatically take into account for another booking. We also use your data given during bookings to provide you with pre-populated forms, for example for online check-in and at self-service check-in kiosks. If you fill out other forms, such as during your participation in a lucky draw or when you send customer feedback using one of our electronic feedback forms on the website, the necessary contact details required are also pre-populated from your Travel ID profile.

The legal basis for the processing of your data is fulfilment of the contract in accordance with Art. 6(1)(b) GDPR.

Displaying and managing your flight bookings

Flight bookings are automatically saved and displayed in your Travel ID profile if you make the booking while logged in. If you add a flight booking to your Travel ID profile after this, we check whether the booking is complete and add information you have saved in your Travel ID profile as required. No data will be overwritten without your consent.

The summary of your flight bookings is limited to 10 years and also includes the creation and display of flight statistics, among other things.

If you change your previous customer profile from one of the Lufthansa Group airlines to a Travel ID profile, your past flight bookings from your previous customer profile will also be displayed in your Travel ID profile.

The legal basis for the processing of your data is fulfilment of the contract in accordance with Art. 6(1)(b) GDPR.

Personalised service when you contact our employees and contact points

We use the data you have entered in your Travel ID profile to be able to offer you personalised services. We process data that you have entered in your Travel ID profile during registration or at a later date, as well as data that we have recorded, for example, as part of the flight bookings made via Travel ID. This also includes flight delays or cancellations and baggage problems. We also process your data from enquiries to our Service Centre and other interactions, for example with the crew on board our aircraft.

Based on this processing, we can improve our complaints management system and offer you a personalised service as a Travel ID customer at all our contact points. Your enquiries to our Service Centres will be displayed in your Travel ID profile and can be managed by you.

The legal basis for the processing of your data is fulfilment of the contract in accordance with Art. 6(1)(b) GDPR.

Proactive contact a part of contractually agreed services

If you have used products and services of the Travel ID operators using your Travel ID profile, we may wish to contact you about these services, for example, if we have been repeatedly unable to offer you the service promised. We use data for this purpose for example regarding any problems and customer feedback, the number and severity of the incidents, travel and service preferences and events in your Miles & More membership.

The legal basis for the processing of your data is our justified interest in accordance with Art. 6(1)(1)(f) GDPR.

Verifying and storing entitlement to special conditions and reductions

If you belong to one or more customer groups (e.g. students), you can have your membership of such customer groups verified and confirmation stored in your Travel ID profile. If you book a trip later while logged in for example, we can use the customer group status stored in your Travel ID profile to check whether you are entitled to claim specific customer group benefits.

The legal basis for the processing of your data is provided by the consent granted by you in accordance with Art. 6(1)(a) GDPR.

You have the right to withdraw your consent to the confirmation of your customer group at any time, without affecting the lawfulness of any processing performed on the basis of this consent until it was withdrawn. You can delete the confirmation(s) in your Travel ID profile under "Customer groups" to do so.

Your entitlement to special conditions and reductions will be deleted automatically once they are no longer valid.

Checking stored travel documents

You have option of storing travel documents such as your passport or visa in your Travel ID profile. We will keep this data for you in a separate secured database. If you are logged in and book a trip that requires you have certain travel documents, we will automatically populate your flight booking with the information stored in your Travel ID profile. This process is not carried out if your flight booking already contains your travel documents details.

The legal basis for the processing of your data is provided by the consent granted by you in accordance with Art. 6(1)(a) GDPR.

You have the right to withdraw your consent to use of the data from the travel documents at any time, without affecting the lawfulness of any processing performed on the basis of this consent and before such consent was withdrawn. To do this, you can delete your travel documents in your Travel ID profile under “Personal Documents”.

Your travel documents will be deleted automatically once they are no longer valid.

Settings to personalise our offers

If you have booked a flight, the Lufthansa Group airlines would like to contact you about possible additional services related to your flight. These additional services may include flight-related services of the Lufthansa Group airlines, such as premium meals or upgrades, but also additional services of partner companies of the Lufthansa Group airlines (information about partner companies of the Lufthansa Group airlines: [Austrian Airlines](#), [Brussels Airlines](#), [Eurowings](#), Discover Airlines, [Lufthansa](#), [Swiss International Air Lines](#)), as well as rental cars or insurance companies. Data stored about you in your Travel ID profile and at Lufthansa Group airlines (e.g. flight data and preferences) is processed for this purpose.

The legal basis for the processing of your data is provided by the consent granted by you in accordance with Art. 6(1)(a) GDPR.

You give this consent during the registration process or later in your Travel ID profile, and this can be managed by you at any time in your Travel ID profile.

Personalised advertising communication

Promotional contact by Travel ID operators

As described in the section “Settings for personalizing our offers” in this Privacy Notice, you have the option of giving your consent to our determining your main areas of interest, as well as sending information and personalized offers based on this regarding the services of Lufthansa Group airlines and their respective partner companies (information about partner companies of the Lufthansa Group airlines: [Austrian Airlines](#), [Brussels Airlines](#), [Eurowings](#), Discover Airlines, [Lufthansa](#) and [Swiss International Air Lines](#)), via digital communication channels (e.g. by email, SMS/MMS, messenger services, search engines, videos, banners) and by telephone or the websites of LHG airlines.

In addition, you can give Miles & More GmbH consent to send you offers relating to your possible membership in the Miles & More programme if you are not yet a member of the Miles & More programme.

Since we only want to provide you with information and offers that really interest you, with your consent, we thus process the booking information stored with the Lufthansa Group airlines, such as travel route, travel period and booking class, as well as preferences stored in your Travel ID profile. For example, by analysing information regarding your forthcoming trip, we may send you special offers or vouchers for additional services for your trip or for services available at your travel destination.

Individualised advertising through customer data comparison (CRM Datamatch)

One way to provide you with personalised information and offers tailored to you is to identify you on websites of partners or advertisers.

For this purpose, we transmit your email address and/or telephone number stored in your Travel ID profile, which was previously encrypted with the SHA 256 hash algorithm, which is recommended by the Federal Office for Security as "cryptographically strong", to a so-called data clean room. A data clean room is a secure environment isolated from external technical influences for processing personal data. It aims to facilitate the exchange of data between advertising companies, in this case the Travel ID operators, and partners or providers of advertising spaces, while protecting the privacy of the respective customers as much as possible. For this purpose, the partners or advertising companies also supply data of their customers to the data clean room using the same encryption method. As part of a data comparison, hits (data matches) are sent to so-called audiences (person groups), which in turn can be analysed by the Travel ID operators and addressed for advertising purposes. Access to the data we provide to a data clean room is only granted by us to selected partners and advertising space providers, and after the conclusion of corresponding data processing contracts. Depending on technological development and marketer support technology, we ensure that stronger and more secure encryptions and/or extensions are used.

Eine Möglichkeit Ihnen auf Sie zugeschnittene, personalisierte Informationen und Angebote zu unterbreiten ist, Sie auf Websites von Partnern oder Anbietern von Werbeflächen zu identifizieren.

CRM Datamatch with Google Customer Match

In the case of CRM Datamatch with Google Customer Match, we provide encrypted data to a data clean room operated by Google in accordance with a process described in the section "Personalised advertising through customer data matching (CRM Datamatch)". In this data clean room, Google compares the data we provide with those of Google Account customers that is encrypted using the same SHA 256 hash algorithm. Matches are summarised by Google in a list of what are referred to as "audiences". As soon as this process is completed (max. 48 hours), the encrypted data is deleted. If you belong to such an audience, Google can identify you when you are surfing using Google platforms and show you our personalised advertising.

The condition for the processing of your personal data in Google Customer Match is that you possess a Google account in which you have given Google permission to display personalised advertising. You can change this setting to suit your preferences in the privacy tab in your Google user account.

The controller for the processing of personal data as part of Google Ads/Google Customer Match and within the meaning of the GDPR is Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Ltd is a subsidiary of Google LLC, which has its head office registered in California, USA, and is subject to the laws of that location, and may therefore may also have to grant access to data processed outside the USA.

You can find further information about the processing of your personal data by Google in the [Google](#) Privacy Notice.

Personalised advertising through customer data matching via Meta

So that we can display personalised advertising to potential new customers or prospects on Meta platforms such as Facebook and Instagram, and measure the performance of our advertising activities, we use Meta Pixel technology in conjunction with Meta Conversion API of the company Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (referred to below as "Facebook"). In so doing we record visits to our websites, your flight searches and bookings and send these to Facebook in encrypted form using the SHA 256 hash algorithm. Facebook uses this data to identify its own customer groups with similar interests and allows us to display advertising to these customer groups on Facebook and Instagram. We also have the option of presenting offers relating to flight searches to undecided customers.

Meta Platforms Ireland Limited is a subsidiary of Meta Platforms Inc., which has its registered head office in California, USA, and is subject to the laws of that location. It may therefore also be obliged to provide access to data processed outside the EU.

We are joint controllers with Meta for the collection and transfer of data in this process. We have a corresponding agreement with Meta governing our responsibility as joint controllers.

You will find further information regarding the processing of your personal data at Facebook in the [Facebook Privacy Notice](#).

You can contact the Data Protection Officer of Facebook via the online contact form provided by Facebook.

The legal basis for all processing of your data listed in the section “Personalized advertising communication” is provided by the consent you have given for this in accordance with Art. 6(1)(a) GDPR.

You give this consent during the registration process or later in your Travel ID profile, and this can be managed by you at any time in your Travel ID profile. You can decide for yourself the extent to which you wish to receive information and individual offers from us by adjusting your communication settings. You may withdraw your consent to marketing communications also for individual areas (such as for the email newsletter only) in your Travel ID profile.

Data transfers between Travel ID operators

If you have a Travel ID profile and your Travel ID profile is not linked to a Miles & More member account, the Lufthansa Group airlines will exchange your data among each other in order to offer you the services specified in the Travel ID Terms and Conditions of Use. Miles & More GmbH will only receive data from you that is required to manage your Travel ID profile (e.g. contact details, date of birth and your voluntarily stored profile data) and will not process this data for its own purposes.

If you have linked your Travel ID profile to your Miles & More member account, the Travel ID operators will exchange your data among each other in order to offer you the services specified in the Travel ID Terms and Conditions of Use. You decide for yourself whether to make the connection. If you make such a connection, data synchronisation is performed between your Travel ID profile and your Miles & More account. Specifically, the data stored by you in both accounts is carried over as follows:

All master data (such as name, date of birth, postal address, telephone) and preferences (such as preferred departure airport) is automatically transferred from your Miles & More account. The email address will be taken from your Travel ID profile.

The legal basis for the transfer of your data is fulfilment of the contract in accordance with Art. 6(1)(b) GDPR.

If you have given Miles & More GmbH your consent to receive personalised advertising communication (see the section “Personalised advertising communication”, Miles & More GmbH will also process your flight data (such as your route, travel class, departure airport, destination airport) for this purpose.

Transfers to a third country

Your customer group status is verified by our commissioned processor SheerID, Inc. with its registered office in the USA. Data transfers are carried out based on the EU-U.S. Data Privacy Framework under which SheerID, Inc. is certified with the U.S. Department of Commerce.

Your personal data is also processed in principle within the EU.

“Login“ und „stay logged-in“-Funktion

When you log in to a website or other contact point of a Travel ID operator for the first time, you will be prompted to enter your access details. In order to recognise you during your session, we set a “log-in” cookie. This cookie allows you to be logged in automatically when visiting websites of other Travel ID operators without having to enter your login credentials again.

You also have the option of actively selecting a “stay logged-in” feature on the websites of the Travel ID operators where you have already logged in, so that after finishing your session, you will not be required to log in again when re-visiting the website.

For this purpose, we also use a cookie that automatically recognises you when you visit the website/touch point again.

When the “stay logged-in” feature expires, you will be asked to log in again. In addition, you will always be prompted to log in again if you are in the process of carrying out activities which require an enhanced level of security.

The legal basis for the processing of your data is provided by the consent granted by you in accordance with Art. 6(1)(a) GDPR.

Duration of storage

We process your data to the extent and as long as necessary for the processing purposes described in this Privacy Notice.

If the purpose for which your data was processed no longer applies, this data will be deleted, unless its retention is required for the following purposes:

- Compliance with statutory retention periods that may derive from obligations under commercial or tax law. These periods may be up to ten years.
- Enforcement, exercise or defence of legal claims

In these cases, processing your data will be restricted (“blocked”) so that it can no longer be processed for other purposes.

Deleting your Travel ID profile

If you no longer wish to use the Travel ID services, you may delete your Travel ID profile at any time. The personal data collected in connection with your use of Travel ID will then be deleted immediately, subject to conflicting statutory retention requirements and obligations.

You can delete your Travel ID profile and any specific items of data you have provided in your Travel ID profile yourself by logging into your Travel ID profile and deleting it there.

We will also delete your provisional Travel ID profile if you do not confirm your registration within the period specified in the confirmation email or if you receive a confirmation email with the activation link more than three times and you do not confirm it.

We also delete your profile after a specified period of inactivity (see paragraph “Notifications to your Travel ID profile”).

Your rights as a data subject

Your rights

As the data subject, you can exercise the following rights where the respective statutory conditions exist

- Right to information, Art. 15 GDPR
- Right to rectification, Art. 16 GDPR
- Right to deletion (“right to be forgotten”), Art. 17 GDPR (see also paragraph “Deletion of your Travel ID profile” of this Travel ID Privacy Notice)
- Right to restriction of processing, Art. 18 GDPR
- Right to data portability, Art. 20 GDPR
- Right to object, Art. 21 GDPR (see also the section “Right to object under Art. 21 GDPR” of this Travel ID Privacy Notice)
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Insofar as we process your data on the basis of consent, you have the right to withdraw this consent at any time without affecting the lawfulness of any processing performed on the basis of this consent before such consent was withdrawn.

To exercise your rights, you can contact the respective Travel ID operators from the “Who Can You Contact” section of this Privacy Notice. In order to process your application and identify you, we will process your personal data in accordance with Article 6(1)(c) GDPR.

In your Travel ID profile, you can also check the current status of most of your master data yourself at any time. Please update your personal data immediately after any changes occur (for example if you change your email address or telephone number). To delete your Travel ID profile, you can also proceed as described in the paragraph “Deletion of your Travel ID profile”.

You also have the right under Art. 77 GDPR to lodge a complaint with a supervisory authority.

Relevant supervisory authorities

You will find a list of all data protection authorities responsible for the Travel ID operators below.
The relevant supervisory authority for Deutsche Lufthansa AG, EW Discover GmbH and Miles & More GmbH is:

The Officer for Data Protection and Freedom of Information of the State of Hesse
Postfach 3163
65021 Wiesbaden
Germany
Telephone: +49 - 611 - 14 08 - 0
Fax: +49 - 611 - 14 08 - 900 or - 901
Email: poststelle@datenschutz.hessen.de

The competent supervisory authority for Eurowings GmbH is:

Regional Officer for Data Protection and Freedom of Information
State of North Rhine-Westphalia
Postfach 20 04 44
40102 Dusseldorf
Germany
Tel.: +49 - 211 - 38 424 - 0
Fax: +49 - 211 - 38 424 - 999
Email: poststelle@ldi.nrw.de

The competent supervisory authority for Austrian Airlines AG is:

Austrian Data Protection Authority
Barichgasse 40-42
1030 Vienna
Austria
Telephone: +43 - 52 - 152 - 0
Email: dsb@dsb.gv.at

The competent supervisory authority for Swiss International Air Lines AG is:

Federal Data Protection and Information Commissioner
Feldeggweg 1
3003 Bern
Switzerland
Telephone: +41 - 58 - 46 24 395
Fax: +41 - 58 - 46 59 996
For data processing that is subject to the GDPR:
The Officer for Data Protection and Freedom of Information of the State of Hesse
Postfach 3163
65021 Wiesbaden
Germany
Telephone: +49 - 611 - 14 08 - 0
Fax: +49 - 611 - 14 08 - 900 or - 901

Email: poststelle@datenschutz.hessen.de

The competent supervisory authority for Brussels Airlines SA/NV is:

Autorité de protection des données
Gegevensbeschermingsautoriteit
Data Protection Authority
Rue de la presse 35, 1000 Brussels
Belgium
Telephone: +32 - 2 - 27 44 800
Email: contact@apd-gba.be

Right to object under Art. 21 GDPR

You have the right to object to the processing of your personal data based on Article 6(1)(f) GDPR at any time on grounds relating to your particular situation.

In the event of an objection, we will no longer process the personal data concerning you, unless we can prove that there are compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms, or if the processing is used to enforce, exercise or defend legal claims.

If the personal data concerning you is processed by us for the purpose of direct marketing and you object to this processing, the personal data concerning you will no longer be processed for these purposes.

You can object to the processing of your personal data at any time, for example using the contacts named in the “Who can you contact” section.

Data security

We use technical and organisational security measures to protect your data against accidental or deliberate manipulation, loss, deletion or access by unauthorised persons. Our security measures are continuously improved as new technology develops.

Recipients of your data

In connection with the processing operations described in this Travel ID Privacy Notice, we may disclose your data to the following categories of recipients:

- Service providers with which we cooperate on the basis of a commissioned processing contract under Art. 28(3) GDPR;
- Government agencies and authorities, e.g. due to police and investigative activities.

Personal data may be transferred worldwide to third countries or international organisations in this context. Appropriate security measures will be taken for such data transfers to protect you and your personal data in accordance with and in compliance with the statutory regulations.



We use EU standard contractual clauses if these transfers are made to a third country for which the EU Commission or the relevant authorities have not issued an adequacy decision. You will find information about EU standard contractual clauses on the [European Union website](#).

In exceptional cases, the transfer to countries without adequate protection may also be permissible in other cases, e.g. based on consent, in connection with legal proceedings or if the transfer is necessary for the execution of a contract.

Updating this Travel ID Privacy Notice

We review this Travel ID Privacy Notice regularly and will update it as required. We will inform you if there are significant changes to this Travel ID Privacy Notice (for example on our website).