



## SAS EuroBonus Business Cards – Privacy Notice

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### 1. Introduction

This Privacy Notice explains how SAS EuroBonus AB (“**SAS**”) processes personal data in connection with the SAS EuroBonus Business Cards program (the “**Program**”), including the related card management, expense management, mobile app, web portal and other digital functionality made available to Companies, administrators and Cardholders as part of the Program. For processing relating to the EuroBonus program, SAS EuroBonus AB and Scandinavian Airlines System Denmark-Norway-Sweden may act as joint controllers as further described below.

Unless otherwise defined in this Privacy Notice, capitalized terms such as “Program”, “Customer”, “Cardholder”, “Creditor”, “App Provider”, “App”, “Admin Portal”, and “Card” have the meaning given to them in the SAS EuroBonus Business Cards Terms and Conditions and any applicable terms of use for the App, Admin Portal or related services.

This Privacy Notice is provided for transparency purposes and does not form part of the contractual terms applicable to the Program. The Program, the EuroBonus program and related card, app and admin portal services may also be subject to separate terms and privacy information provided by SAS, the Creditor, the App Provider or other relevant parties.

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### 2. Who is responsible for your personal data

SAS is the controller for personal data processed by SAS in connection with the Program.

The Creditor acts as an independent controller for personal data processed for its own purposes, including card issuance, credit, payment services, fraud prevention, customer support and regulatory compliance.

The App Provider processes personal data on behalf of SAS as a processor where it provides app, portal and related technical services to SAS in connection with the Program.

For certain EuroBonus-related processing activities, SAS EuroBonus AB and Scandinavian Airlines System Denmark-Norway-Sweden act as joint controllers as described in the applicable Joint Controller Arrangement. <https://www.flysas.com/en/legal-info/joint-controller-arrangement>.

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### 3. Categories of personal data

In connection with the Program, SAS may process:

- Identification, role and contact details for Cardholders, Customer contact persons and administrator(s) (e.g. name, business email address, phone number, job title, role/permissions and Customer affiliation).
- EuroBonus membership information, including EuroBonus Account information
- Information relating to Program participation, including the Cardholder’s connection to the Customer, relevant Card Product and EuroBonus Account, and the status of the Cardholder’s participation in the Program.
- Card, account, transaction and expense-related information processed in connection with the Program, including information generated through use of the App, Admin Portal or related Program functionality.
- Personal data contained in correspondence and support matters relating to the Program, such as messages, inquiries, complaints, support requests and related case notes.
- Personal data contained in technical and usage information relating to the Program, such as login data, device data, IP addresses, access logs and security logs.



Data is primarily received from:

- the Creditor
- the App Provider
- the Customer and/or the Cardholder
- other parties involved in the Program, including through relevant systems, integrations and support channels.

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#### 4. Purposes of processing

SAS processes personal data for the following purposes in connection with the Program:

- to administer and operate the Program.
- to enable participation in the Program and provide Program-related functionality, benefits and communications.
- to administer Cards, Cardholder access and related card and expense management functionality.
- to calculate and allocate EuroBonus Points and other Program-related Benefits.
- to provide customer support and handle Program-related requests.
- to maintain security, prevent misuse or fraud and ensure compliance with applicable terms and law.
- to develop, improve, market and evaluate the Program.

SAS processes personal data only to the extent necessary for the purposes described above and in accordance with the applicable data protection roles and legal bases.

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#### 5. Legal basis

SAS processes personal data on the following legal grounds:

- **Performance of contract** – Article 6(1)(b) GDPR, where processing is necessary to perform or administer the Program, for example to enable participation, provide access to Program functionality, administer Cards and allocate EuroBonus Points or other Program-related benefits.

- **Legitimate interest** – Article 6(1)(f) GDPR, where processing is necessary for SAS' legitimate interests and such interests are not overridden by the individual's rights and freedoms, for example Program administration, customer support, security, fraud prevention, aggregated analytics and service improvement.
- **Consent** – Article 6(1)(a) GDPR, where consent is required under applicable law, for example for certain marketing communications, cookies or optional services that are not necessary for the Program.

Where SAS relies on legitimate interest, SAS carries out a balancing assessment in accordance with applicable data protection laws.

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#### 6. Data sharing in connection with the Program

SAS may share personal data with:

- the Creditor;
- the App Provider;
- SAS Group companies; and
- service providers supporting the Program.

Personal data is shared only where necessary for Program administration, support, security and development, and in accordance with applicable data protection requirements.

The Creditor generally acts as an independent controller for banking-related activities. The App Provider and other service providers act on behalf of SAS under contractual safeguards.

SAS' access to transaction, account, card and expense-related data is limited to what is necessary for the Program and may be restricted by applicable law, banking secrecy, confidentiality obligations and contractual arrangements. Such data will generally only be made available to SAS in aggregated, anonymised or otherwise limited form, unless more detailed access is necessary for the Program and permitted under applicable law and the relevant arrangements between the parties.



## 7. Processors and international transfers

SAS uses trusted service providers to process personal data on its behalf. Such processing is governed by data processing agreements and, where personal data is transferred outside the EEA, appropriate safeguards in accordance with Chapter V GDPR.

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through the relevant SAS channels or otherwise communicated as appropriate.

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## 11. Contact

For questions regarding the processing of your personal data, please contact: [dataprotectionofficer@sas.se](mailto:dataprotectionofficer@sas.se).

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## 8. Retention

Personal data is retained for as long as necessary to:

- fulfil the purposes described above, and
- comply with legal, regulatory and contractual obligations.

When personal data is no longer needed for these purposes, it will be deleted or anonymised, unless continued retention is required or permitted under applicable law, for example for accounting, regulatory compliance or legal claims purposes. Retention periods may vary depending on the nature of the data and the applicable service.

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## 9. Your rights

You have the right to:

- access your personal data
- request correction or deletion
- object to or restrict processing
- withdraw consent (where applicable)

Further information on how SAS processes personal data and how you may exercise your rights is available in SAS' general Privacy Policy and, where applicable, the SAS EuroBonus Privacy Policy. If your request relates to processing carried out by the Creditor or another independent controller, you may need to contact that party directly.

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## 10. Changes and updates

SAS may update this Privacy Notice from time to time to reflect changes in the Program, applicable services, applicable law or SAS' processing of personal data. The latest version of this Privacy Notice will be made available