

DIGITAL SAFETY

Last updated 21/04/2023

This factsheet provides supplementary commentary about what we do as an organisation to ensure that we collect and handle private data in the right way. The information in this document should be read in conjunction with the commentary in our 2022 Annual Report pages 60-68 and our Privacy Statement

 [Privacy policy | easyJet](#)

The information contained in this document covers the period 1 October 2021 to 30 September 2022 (FY22).

easyJet's Digital Safety framework is made up of Data Protection, Data Governance and Cyber Security.

DIGITAL SAFETY FRAMEWORK

Data Protection

Data Governance

Cyber Security

PERFORMANCE AND COMMENTARY

Data protection

easyJet is committed to maintaining the privacy and security of the personal data entrusted to us by our customers and employees. To ensure the protection of such data, we have appointed a Group Data Protection Officer who is registered with the Information Commissioner's Office and who reports into the General Counsel of easyJet.

The Group Data Protection Officer manages easyJet's Data Protection Team and is responsible for managing easyJet's compliance with applicable data protection laws, including responding to employee and customer rights requests and any data protection complaints.

Our policies

easyJet has an internal Group Data Protection Policy and an external Privacy Statement.

Our internal Group Data Protection Policy sets out the principles employees must comply with when handling personal data as part of their job. The policy outlines our commitment to processing personal data transparently, fairly and lawfully. It is supported by a range of digital safety policies, standards and guidance relating to the management of data across the company.

Our publicly facing Privacy Statement (our privacy promise) covers how we collect and manage the personal data we obtain through our airline and holidays businesses. Our privacy promise fulfils easyJet's transparency requirements under data protection law. It provides the complete list of personal data we collect, how it is being used, who it is being shared with, the lawful basis for processing it and the length of time it is retained for. The privacy promise also provides customers with the information they need to make a data rights request or raise a data protection complaint.

See next page for more information

Assurance measures

Data protection is part of our internal audit programme and the Data Protection Office undertakes a programme of data protection impact assessments and other risk assessments and assurance activities on its processing activities. Employees undertake mandatory data protection training each year.

CYBER SECURITY PROGRAMME

At easyJet we put the physical and digital safety of our customers at the heart of their entire journey with us. That is why we have developed a Digital Safety Programme focused on the following key principles:

- Provide a digitally safe and secure environment for all our customers and colleagues.
- Be cyber resilient in a changing threat landscape.
- Enable a digitally safe workforce.
- Provide robust confidence to our regulators.
- Utilise technology to provide a seamless security experience

Safety is in our DNA. Everyone in easyJet is responsible for digital safety and it is crucial that our employees understand their day-to-day obligations. We want to protect our information and the information of our customers, and we all have a role to play in that. easyJet actively promotes the idea that being digitally safe is something we all need to think about and apply to our everyday jobs and tasks – wherever we work across the organisation.

Cyber Security Awareness

easyJet participates in Cyber Security Awareness Month. Through our interactive modules and talks, which included our Group General Counsel, we engage and educate our colleagues on the role they play in minimising the risk of disruptive cyber security.

Assurance measures

Our Digital Safety Programme uses industry frameworks such as NIST Cybersecurity framework and ISO27001/2 series to oversee the maintenance of our digital safety posture. We are subject to annual audit and compliance oversight by our regulators and industry-leading consultants provide us with input, guidance and challenge. We undergo an independent PCI DSS audit each year, which is conducted by our external Qualified Security Assessors.

Reacting a changing cyber threat landscape requires comprehensive vulnerability management. Our approach is threat intelligence led and combines industry leading technology, services and intelligence. Internal and external threats to easyJet are constantly monitored. In line with industry practice we undertake regular internal and external vulnerability scanning and we have processes in place to link this with patch management. In addition to this, we perform penetration tests on new system deployments and regular tests of live systems. Identified exposures and vulnerabilities follow our documented risk management and remediation processes to limit our exposure to these threats. Penetration testing is a core part of our Digital Safety assurance team, the remit of which is to assess and mitigate cyber and data risk both for new business initiatives and for 'business as usual' activities. Regular vulnerability and risk reports are provided to our Airline Management Board.

Compulsory annual digital safety training is required as part of achieving our compliance standards. This is supplemented with additional educational material, awareness campaigns and communications via interactive internal platforms, executive stand-ups and weekly newsletters. Our Digital Safety team participate in pan-industry discussion groups along with broader specialist groups to support industry contribution on subjects related to digital safety.

EASYJET AIRLINE'S PRIVACY STATEMENT

We are committed to protecting your safety and privacy, and we take our responsibilities regarding the protection of customer information very seriously. Our Privacy statement explains what personal data we collect about you, how and why we use it, who we disclose it to, and how we protect your privacy.

1. Who is responsible for your personal data

Our Privacy Policy applies to the personal data that we at easyJet collect and use.

We are easyJet Airline Company Limited and we are a company registered in England and Wales with registration no 3034606 and registered office at Hangar 89, London Luton Airport, Luton, Bedfordshire, LU2 9PF. We control the ways your personal data are collected and the purposes for which your personal data are used by easyJet and we are the "controller" for the purposes of the data protection laws that apply to us, like the GDPR which is the European General Data Protection Regulation or the Swiss Federal Act on Data Protection and the Ordinance.

We are part of a corporate group of companies ("our Group"), which includes easyJet Switzerland S.A (a company registered in Switzerland with registration no 106.034.481 and registered office 5 Route de l'Aéroport, Meyrin, CH-1215, Geneva, 15 Switzerland). easyJet Switzerland S.A is governed by the Swiss Federal Act on Data Protection and the Ordinance to the Federal Act on Data Protection.

2. Personal data we collect about you

When we refer to "personal data" in this Policy, we mean information that relates to you. Your personal data may include for example your name, your contact details, information relating to your travel itinerary (e.g. your booking reference number) or information on how you use our website and app or you interact with us.

We collect some of your personal data directly from you, for example when you book a flight with us, use our website or our app, use our services or contact us. We may also receive your personal data from our suppliers who provide services to you on our behalf (for example when you provide feedback on our services), our partners when you purchase their travel related products or third parties who act on your behalf, for example travel agents, tour operators or other parties through which you may book a flight.

You can visit a separate page to check [full details of the data we collect](#), including what data we process for each purpose, the legal basis for our processing, and the period for which we keep your data.

For more information on the parties that may exchange some of your personal data with us, please see [section 7](#) below.

If you supply goods or services to easyJet, most parts of this Policy will not be relevant to you; we will only collect and use your business contact information for the purposes of our cooperation and we will retain such information for as long as this is necessary for our legitimate business purposes.

3. How and why we use your personal data

We process your personal data for a range of purposes:

- **Serving you:**

- Managing your account and fulfilling your bookings and orders
- Managing your bookings and purchases
- Managing third party products and services sold through our website or app
- Collecting and transmitting your Advance Passenger Information (API) if you don't save this in your account
- Getting clearance to travel
- Getting you in the air
- Dealing with flight disruptions, and managing flight disruption claims and other claims
- Keeping you safe
- Running our easyJet Plus scheme
- Communicating with you
- Telling you about products and services we think will interest you
- Managing corporate accounts

- **Improving our products and services:**

- Analysing customer survey responses

- **Running our business:**

- Investigating and dealing with disruptive and banned passengers
- Detecting, monitoring, and preventing fraud
- Responding to your requests to exercise your rights under data protection law
- Financial, audit and tax reporting
- Responding to requests for disclosure of information (e.g. from the police)
- Responding to media enquiries or issuing press releases

You can visit a separate page to check [full details of the data we collect](#), including what data we process for each purpose, the legal basis for our processing, and the period for which we keep your data.

You are not required to provide to us any personal data but, if you do not do so, you may not be able to purchase or make use of our products and services, or the functionality of our services may be reduced.

We also use cookies; please see section 6 for more information.

4. Your data protection rights

The GDPR and other data protection laws give you specific rights that help you be in control of your personal data and we want to make it easy for you to exercise these rights. Below you will find more information about your rights and how we work to fulfill these. You can exercise any of your rights in relation to the data that easyJet holds about you, by completing the form which is available at the end of this section.

Data access

You are entitled to know whether we hold your personal data and if so, receive a copy of your data. You can use the form at the end of this section to request a copy of your personal data.

In order for us to be able to process your request, you will need to provide us with the required information below:

- Your full name.
- A description of the data you would like to access including a date range (e.g. your flight history for the past 12 months). An accurate description of your request will save you time and effort and will allow us to focus our searches on what you need and quickly reply to you.
- All email addresses you have used to book easyJet flights or communicate with us, even if you no longer use these.
- Other information that may help us locate your data (e.g. your booking references).

For the protection of your information, we will also need to verify your identity, so make sure you upload in the form a copy of your current and valid photo ID (e.g. passport page).

If you submit a request on behalf of another person, we will need to ensure that this person has authorised you to make this request and receive their data. To make it easier for you, we have included in our form a simple consent form to ensure that you have the right to submit your request.

Please note that our Data Protection team does not deal with requests for invoices. In order to quickly and easily receive invoices of your bookings, please use the [Contact us form](#).

Data portability

You have the right to receive some of your data in a portable and reusable format. At easyJet, we are happy to provide you with a portable copy of your flight history; other than that, we do not really hold data that would be covered by the right to data portability.

This is an example of the information you will receive if you send us a data portability request:

Booking reference	Date	Flight No.	Origin	Destination	Currency	Price	Seat No.
FG123H	23/12/2016	EZY123	LTN	LIS	GBP	25.99	9B

We are very interested to know the reasons you want to obtain your data in a portable format and how you are planning to use it, so we welcome all comments in this respect. This is a new data right and we're keen to understand how we can provide portable data that's really useful. Please note that providing this information is not mandatory and it will not affect the way we will process your request but it will help our future planning.

Data rectification

If you believe that we hold incorrect or incomplete information about you, please let us know and we will correct it. Most of the times, you will be able to correct and update your information through your easyJet online account. If this not possible, you can use the form below to notify us.

Please note that any requests for changes in your active bookings, for example changes of passenger names or of travel document details, will be processed by Customer Services, so contacting our Customer Service team directly will save you time.

Data deletion

We will retain your information for the period required to fulfil the purposes set out in this Policy and when there is a legal obligation to do so.

Data restriction

In certain circumstances, you may ask that we continue to store your data but not use it. For example, if you consider that we hold information relating to you that you may need for legal purposes, you can request from us to not delete this information.

Objection

You have the right to object to the use of your data for direct marketing purposes at any time. Please see [section 3](#) above for more details on how you can unsubscribe from marketing.

Also, you may consider that you have reasons to object to the use of your data when such use is based on our legitimate interests as explained in this Policy. Before using your data for our business interests we have balanced these interests against your rights and freedoms; however, if you consider that you have grounds to object to the use of your data, you can explain to us your particular situation and we will individually review your request.

Withdrawing consent

Where we process your personal data based on your consent, you can withdraw your consent at any time as indicated below. This does not affect the legality of any processing carried out before you withdrew your consent.

Data related concerns

In our Customer Charter we promise to make it easy and be open and upfront with you – this also applies to how we use your personal data. We always aim to be clear and transparent with our customers but we understand that sometimes this can be complicated. If you have a concern in relation to how we use your personal data and satisfy your rights, please let us know; we will reply to your queries and if necessary take steps to ensure our practices are consistent with our promise and our obligations. If you are still not satisfied with the way we use your personal data and you believe this is not in accordance with data protection laws, you have the right to lodge a complaint with a data protection authority. In the UK, the relevant supervisory authority is the [Information Commissioner's Office \(ICO\)](#). You can contact the ICO via their web-form at <https://ico.org.uk/> concerns/or call the ICO helpline on +44 (0)303 123 1113.

You can easily exercise your above rights by completing our form:

Data Protection Request Form

After you submit the form, you will receive a confirmation receipt. If we need more information from you to process your request, we will contact you to let you know. If you have provided all the required information, we will process your request as soon as possible within one month.

5. Protecting your personal data

We are committed to protecting the personal data we hold by taking appropriate technical and organisational measures against unauthorised, unlawful or accidental access, loss, destruction or damage of such personal data. We are constantly taking steps to improve in the field of Information Security as the sector itself is constantly changing as well.

How you can protect your data

You can follow some simple steps to keep your information secure. When you create your easyJet account, choose a strong password that is unique to this account and do not share your password with other people. If you use the same password across your different accounts, you increase the risk of your data being compromised if your password is accidentally or unlawfully accessed by another person. If you suspect that someone else has got access to your password, make sure that you change it immediately.

If you receive an email that looks suspicious, e.g. it refers to a booking that you are not aware of, or you have doubts as to whether an email was actually sent by easyJet, please report it to us. You can use the form in section 4 above. Please note that we will never ask for your payment card details via email. Also, if you receive communications about free easyJet flights, you may reasonably suspect that these are fraudulent; we always try for our flights to be affordable, however, it's most likely that we will not be able to offer them for free.

When we promote our offers, we do so by using the same email account through which we send you all our marketing communications and we will not ask for your personal information in these emails. Also, be aware that we promote our offers or any competitions that we may organise on social media only through our official page. If you have doubts whether a post, notification or communication you receive is authentic, you can easily verify whether the same information appears on our official website. If this is not the case, please let us know so that we can investigate and take necessary action.

How we protect your data

When you provide your personal data through our website or our mobile app, this information is transmitted across the internet securely using industry standard encryption.

Furthermore, easyJet is a PCI DSS compliant organisation. This means that we adhere to high security standards in order to protect your payment card details when you are sending us this information.

The information that you provide to us will be held in our systems, which are located on our premises or those of our appointed suppliers.

As described in this Privacy Policy, we may in some instances disclose or allow access to your information by third parties who act for us for the purposes described in this policy or for other purposes approved by you. Where these third parties process your personal data on our behalf, we require that they have appropriate technical and organisational measures in place to protect this data.

Your personal data may be accessed by and processed outside the European Economic Area (the European Economic Area being the European Union and Iceland, Liechtenstein and Norway, also referred to as the 'EEA') – including by staff operating outside the EEA who work for us or for our suppliers or agents (this includes staff engaged in, among other things, the fulfilment of your booking, for example our ground handling agents who assist you at the airport, and the provision of support services). Where your personal data are transferred outside of the EEA, we require that one of the following appropriate safeguards is in place, in accordance with data protection laws:

- there is a decision by the European Commission that the country to which our customers' data is transferred provides an adequate level of data protection;
- in absence of such decision, the contracts that we have in place with these suppliers include EU approved model clauses in relation to the protection of our customers' data;
- when our suppliers access customer information from the US, we aim to ensure that they participate to the EU-US Privacy Shield framework, a self-certification mechanism that provides safeguards in relation to data transfers to US companies.

We also provide links to third party websites through our website. These are subject to separate Privacy Policies and are not controlled by easyJet. Please be aware that this Privacy Policy does not apply to such websites and easyJet is not responsible for your information that third parties may collect through these websites.

Also, in some instances we may be compelled by law to disclose our customers' personal data to a third party, such as airports and border control agencies, and we have limited control over how data is protected by that party.

6. Why we use cookies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website and app, we may use technologies, such as cookies, pixels or tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website. This software doesn't let us collect any personal data. In addition, in order to understand how our customers interact with the emails and the content that we send, we use pixels that allow us to know if the emails we send are opened or if the content of our emails is displayed in text or html form.

We also use cookies in our website, mobile app or in our emails. Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our website or app and allow us to provide features such as remembering aspects of your last flight search to make subsequent searches faster. You can delete cookies if you wish; while certain cookies are necessary for viewing and navigating on our website or app, most of the features will be still accessible without cookies.

For more information on how we use cookies and how you can remove them, read our [Cookie Policy](#).

7. Sharing personal data

Your personal data may be shared with other companies within our Group. It may also be disclosed to a third party who acquires us, a member of our Group or substantially all of our assets.

We may also share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- **Airports, government authorities, law enforcement bodies** and regulators when this is necessary to get you to your destination or is required by law.
For example, for specific travel routes we are required by law to provide border control agencies with information that relates to your travel documents and to your travel itinerary. This information is known as API (Advance Passenger Information). See our [help page](#) for more details about travel documents and API.
- **Travel agents or other companies through which you book your easyJet flights**
- **Suppliers providing services to us in order to help us run our business and improve our services and your customer experience.** We may for example share your personal data with the companies who provide ground services for us to the airports to which we operate. We may also disclose your information to our contact centre, the companies who help us get your feedback on our services or the company that provides IT support to us.
At easyJet, we select very carefully our suppliers who process your personal data on our behalf and require that they comply with high security standards for the protection of your personal data.
- **Credit and debit card companies**
easyJet shares some of your personal data, which includes information about your method of payment, flight booking and in some cases passenger names, to the credit or debit card company that issued the card you used to make your booking. In order to ensure the security of your transactions and prevent or detect fraudulent transactions, we will usually also share your information with our fraud screening partner.
- **Our partners who offer travel related products and services through our website, promote offers or co-organise competitions on our website**
From time to time, we make certain third party offers available through our website or we may publish competitions co-organised by third parties. If you choose to purchase products or services offered through our website by third parties, accept offers or participate in a competition, some of your personal data, such as your contact details and your billing information, may be directly collected by or disclosed to that third party.

Below you will see a list of the parties that offer their products or services through our website and as such your information may be collected by or transferred to them when you purchase their products or services. Please note that this list is not exhaustive and is subject to change:

- Hotelopia S.L.U. a legally constituted Spanish company, which operates as a wholesale-retail travel agency. Hotelopia, S.L.U. is based in Palma de Mallorca 07006 (Spain), C/Calle Padre Ventura 19, with licence number BAL-481 M/D, tax identification code B-57218356 and registered in the Mercantile Register of Mallorca (page PM-44857, volume 2007, folio 148).
- Etrawler Unlimited Company, an Irish registered company trading as CarTrawler under company number 93433 whose registered office is at Classon House, Dundrum Business Park, Dundrum, Dublin 14, Ireland.
- Collinson Insurance Services Limited, a company registered in England and Wales with registered number 00758979 whose registered office is at Cutlers Exchange, 123 Houndsditch, London, EC3A 7BU and Zurich Insurance plc, a public limited company incorporated in Ireland (registration no. 13460) with its registered branch in the UK, (UK establishment number BR7985), located at The Zurich Centre, 3000 Parkway, Whiteley, Fareham, Hampshire, PO15 7JZ.
- Booking.com B.V., a company registered with the trade register of the Chamber of Commerce in Amsterdam, the Netherlands, under registration number 31047344, with VAT registration number NL805734958B01.
- Our following partners that offer transport from and to the airport: Holiday Taxis Group Limited, a company registered in England under number 04391036, whose registered office is at Suite B 2nd Floor Moore House, 13 Black Lion Street, Brighton, East Sussex, BN1 1ND; easyBus Limited, a company registered in England under number 04671315, whose register office is at 10 Ansdell Street, Kensington, London, United Kingdom, W8 5BN; Govia Thameslink Railway Limited ("Gatwick Express"), a company registered in England and Wales under company number 07934306, with registered office at 3rd Floor, 41-51 Grey Street Newcastle Upon Tyne, NE1 6EE; National Express Group PLC ("National Express"), a company registered in England and Wales under company number 2590560, whose registered office is at National Express House, Birmingham Coach Station, Mill Lane, Digbeth, Birmingham, B5 6DD; Abellio East Anglia Limited ("Stansted Express"), a company registered in England under number 07861414, whose registered office is at 2nd Floor St Andrew's House, 18-20 St Andrew Street, London, United Kingdom, EC4A 3AG; Arriva The Shires Limited ("Greenline"), a company registered in England under number 02116519, whose registered office is at 1 Admiral Way, Doxford International Business, Park, Sunderland, Tyne & Wear, SR3 3XP.
- Our partners that offer parking at the airport: ABC Holiday Extras Limited, a company registered in England under number 02936446 whose registered office is at Ashford Road, Newingreen, Hythe, Kent, CT21 4JF; Parkcloud Limited, a company registered in England under number 06557569, whose registered office is at Peter House, Oxford Street, Manchester, England, M1 5AN; Società Esercizi Aeroportuali S.p.A., a company registered in Italy, Milan under number 00826040156, whose registered office is at Aeroporto Milano Linate – 20090 Segrate (Mi)C. Fis.

- GetYourGuide Deutschland GmbH, a company registered in Germany under number HRB 132059 B Amtsgericht Charlottenburg, whose registered office is at Erich-Weinert-Straße 145C 10409 Berlin, Germany.
- TrustedHouseSitters Limited, a company registered in England under number 07227301 whose registered office is at 20-22 Wenlock Road, London, N1 7GU.
- When you acquire the easyJet Euro currency card, your information will be transferred to R. Raphael & Sons plc, a company registered in England under number 01288938, whose registered office is at 19-21 Shaftesbury Avenue, London, W1D 7ED and Payment card technologies (Retail) Limited, a company registered in England under number 06691616 whose registered office is at Fifth Floor, 48-54 Moorgate, London, EC2R 6EJ.
- Accordingly, when you purchase products available on board, your information will be transferred to our partner offering these products: gategroup Holding AG, a company registered in Switzerland under registration number 1299932, and whose registered office is at Sägereistrasse 20, Glattbrugg, Zurich, 8152, Switzerland Balz-Zimmermanstrasse 7, 8302, Kloten, Switzerland, and/or its affiliate companies.
- If you book the Fear of Flying course, part of your data will be transferred to FOF Events Limited, a company registered in England under registration number 06872193 and whose registered office is at 19 Diamond Court, Opal Drive, Fox Milne, Milton Keynes, Buckinghamshire, MK15 0DH, United Kingdom.
- When you book connected flights through the "Worldwide by easyJet" service, your personal data will be shared with our partner airlines you will chose to fly with and Gatwick Airport through the GatwickConnects service.
Our partners have their own privacy policies and terms of use over which easyJet does not have control. Whilst easyJet carefully selects these partners, it has no responsibility or liability for their privacy policies, terms of use or the way they process your personal data. Please make sure that you review the relevant privacy policies and terms of use of these partners prior to purchasing their goods or services, using their websites, apps or services or providing any personal data to them.

- **Authorities, including the Civil Aviation Authority**

In some circumstances, we may also be required to disclose part of your personal data to the UK Civil Aviation Authority ("CAA") or other national CAAs, for the purposes of ensuring compliance with and the enforcement of ATOL regulations or for other regulatory purposes.
In addition to the categories of parties listed above, we may disclose your personal data when this is required by the law of any jurisdiction to which easyJet may be subject.

8. Updates to our Privacy Policy

Our Privacy Policy is a dynamic tool and we will modify it when there is a change to the way we process your data. We may update this Privacy Policy from time to time, to ensure that the information we provide to you is up to date and in accordance with the relevant data protection laws. Any new version of this Policy will be published on our website.

9. Contact information

Questions, comments and feedback regarding this Privacy Policy, are welcomed and should be addressed to our Group Data Protection Officer through the form available in section 4 above or in writing to the following address:

easyJet Group Data Protection Officer
Hangar 89
London Luton Airport
Luton, Bedfordshire
LU2 9PF
United Kingdom.

Email: data.protection@easyjet.com



easyJet Holidays has a separate Privacy statement.

Please see here – <https://www.easyjet.com/en/holidays/info/privacy-policy>