

SUNRISE AIRWAYS | PRIVACY POLICY

At **Sunrise Airways**, we are committed to protecting your privacy and to the responsible, transparent, and secure handling of the personal information we collect.

This Privacy Policy explains how we collect, use, store, share, and protect your information when you visit our website, use our mobile application, travel with us, or interact with any of our services.

Sunrise Airways is committed to not selling or sharing, in whole or in part, the personal information mentioned above. Personal Data will only be transferred or disclosed at the request of a competent authority. Otherwise, **Sunrise Airways**, as well as its sister companies, affiliates, or subsidiaries, will use such data and information solely for the purposes set forth herein, and only with the express consent of the data subject.

By accepting this Privacy Policy, you grant your free, express, and informed consent to **Sunrise Airways** for the collection, use, and processing of your Personal Data and/or the Personal Data of other data subjects who have authorized you to provide such information, in order to ensure the provision and performance of the contracted services and for the purposes established in this Privacy Policy. Acceptance and consent are given when you:

- Check and/or select the consent boxes within the booking, purchase, and/or website flows;
- Acquire any of our services through our sales points and/or customer service in non-face-to-face channels;
- In the case of call centers, continue on the call after hearing the recording regarding the use of Personal Data;
- Search for or request quotes for flights, products, and/or services on **Sunrise Airways** websites and/or Call Center.
- Register to receive promotions and/or news about the products and/or services offered by **Sunrise Airways**;
- Send Personal Data necessary to address inquiries and/or claims through the authorized channels and/or by using Sunrise Airways' self-service channels and forms.
- Use our website and/or digital channels while accepting the use of cookies to continue browsing and accessing their content. I understand that I may manage my preferences to disable unwanted cookies.

By using our services, you acknowledge that you have read and understood this Privacy Policy.

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1. INFORMATION WE COLLECT

We may collect the following categories of information:

1.1. Personal Information

Data that identifies you individually, such as:

- Full name
- Date of birth
- Passport, identification card, or other travel documents
- Contact details (email address, physical address, phone number)
- Payment and billing information
- Frequent flyer program data
- Itineraries, bookings, and travel history
- Special requests (assistance, medical services, accessibility)
- Information required for immigration, security, or customs processes;

1.2. Sensitive Data

Collected only when voluntarily provided or when required by law:

- Medical information necessary to ensure the safety or feasibility of the trip
- Information related to special needs or medical requirements

This data is handled with enhanced security measures.

1.3. Non-Personal Information

Includes data that does not allow direct identification:

- IP address and device information
- Browser type, operating system
- Cookies, digital tags, and browsing data
- Statistical and analytical data about the use of the website or mobile application

2. HOW WE COLLECT YOUR INFORMATION?

Information is collected through:

- Direct interactions when you book, purchase, register, or contact us; when you travel with us, use the airports where we operate, or visit our facilities
- Our website, mobile application, electronic forms; when you communicate with us via email, phone, in writing, or through social media
- Travel agencies and third-party platforms
- Airport authorities, governmental systems, and aviation service providers

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- Cookies and digital tracking technologies

3. HOW WE USE YOUR INFORMATION?

We use your information for the following purposes:

3.1. Provision and Management of Our Services

- Processing reservations, purchases, payments, and check-in.
- Providing air transportation services and passenger assistance.
- Sending operational notifications and flight updates.
- Managing user profiles and loyalty programs.

3.2. Compliance with Legal Obligations:

- Complying with civil aviation, security, immigration, customs, or any other requirements as mandated by local laws or international agreements of the country of departure, destination, or any country where the aircraft lands or makes a stop—whether for disembarkation, embarkation, maintenance, refueling, or technical stops, when such regulations require it.
- Sharing data with authorities when required by law, regardless of jurisdiction, and only to the extent necessary to comply with such obligations.
- Verifying identity and preventing fraudulent activities in accordance with local and international regulations applicable to air transport.

3.3. Improving Your Experience

- Personalizing services and communications based on your preferences.
- Providing relevant content, promotions, and advertising.
- Conducting statistical analyses to enhance services and processes.

3.4. Commercial Communications

With your consent when required, we may send you:

- Special offers
- Product updates
- Airline promotions and news

You may opt out of receiving these communications at any time.

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4. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies to:

- Ensure the proper functioning of the website
- Remember your preferences
- Analyze browsing behavior
- Display relevant content

You may manage or disable cookies through your browser settings.

5. WITH WHOM DO WE SHARE YOUR INFORMATION?

We may share your information only when necessary and secure, with:

- Service providers (reservations, payment systems, check-in, IT, HITIT)
- Airport, immigration, customs, and security authorities
- Other airlines in the case of connecting flights or commercial agreements
- Sister companies or entities within the same corporate group
- Marketing agencies (only non-personal data for advertising purposes)
- Banking institutions and payment processors

We reserve the right to substitute the airline and/or the aircraft.

6. INTERNATIONAL TRANSFERS

Due to the nature of our operations, your information may be transferred to and stored in other countries where we operate or where our technological providers offer their services.

All transfers are carried out with appropriate safeguards and in compliance with applicable laws.

7. DATA RETENTION

We retain data only for the time necessary to:

- Fulfill the purposes described.
- Comply with legal and regulatory obligations.
- Address legal claims.
- Verify charges, establish or collect debts, or protect the property rights of **Sunrise Airways**, its sister companies, affiliates, or entities within the same economic group.
- Ensure accounting and operational records.

8. YOUR RIGHTS

Depending on the applicable legislation, you may:

- Request access to your data.
- Request corrections or updates.
- Request the deletion of data when applicable.
- Object to processing or request restrictions.
- Withdraw your consent.
- Request data portability.

To exercise these rights, you may contact us at:

✉ privacy@sunriseairways.net

9. MINORS

Our services are not directed to minors without supervision. We only collect data from minors strictly for travel purposes and with the consent of a parent or legal guardian.

10. UPDATES TO THIS POLICY

We may update this Privacy Policy periodically. In such cases, we will publish the revised version with the corresponding update date.

11. CONTACT

If you have any questions or requests related to this Policy or the processing of your personal data, you may contact us at: privacy@sunriseairways.net

The last update to this Privacy Policy was on November 25, 2025.