

FLY & WATCH PRIVACY NOTICE

1. ABOUT THE PLATFORM AND THIS PRIVACY NOTICE

- 1.1. “FLY & WATCH” (which will also be referred to as the “PLATFORM” in this Privacy Notice), is a digital in-flight entertainment platform offered for access on Pegasus flights on your own mobile device (mobile phone, tablets, laptop computers. This platform service is provided in partnership between Immfly (Platform’s Manager) and Pegasus (Airline Operator). Therefore, both entities will act as data controllers of the personal data that you may submit to each of them.
- 1.2. This “Privacy Notice” covers the identity of the data controllers, the purposes for which your personal data will be processed when you use the platform service, to which third parties and for what purposes such data may be transferred, the applicable methods and legal basis for data processing and your rights regarding your own personal data.
- 1.3. The scope of this Privacy Notice is limited only to the processing of personal data in connection with the services provided over the Platform. You may review [Pegasus Privacy Policy](#) and [Immfly Privacy and Cookies Policy](#) for general information on the processing of personal data other than in connection with the Platform services.

2. DATA CONTROLLERS

- 2.1. **PLATFORM MANAGER:** Immfly Turkey Havaçılık Teknolojileri A.Ş. (Central Trade Registry / MERSIS No: 0-4650-8140-8400001), Address: Esentepe Mahallesi Kore Şehitleri Caddesi Yonca Apt. A Blok No: 1-3/13 Şişli İstanbul, Turkey, Telephone: (+34) 935 991 913, E-mail: support@immfly.com, Data Protection Officer E-mail: dpo@immfly.com.
- 2.2. **AIRLINE OPERATOR:** Pegasus Hava Taşımacılığı A.Ş. (Central Trade Registry / MERSIS No: 0-7230-0470-8500017), Address: AEROPARK Yenişehir Mahallesi Osmanlı Bulvarı No: 11/A Kurtköy 34912 Pendik İstanbul, Turkey, Telephone: (+90) 216 560 7000, E-mail: info@flypgs.com, Pegasus Website [Personal Data Application Form](#).

3. PERSONAL DATA COLLECTED

- 3.1. We obtain your data directly from you and transmitted electronically from your mobile device when you purchase paid content for the Platform, through the use of our websites or online forms, on the Platform. Please note that we do not process personal data for registering or using free content on the Platform and we do not process special categories of data such as those relating to racial or ethnical origin, religion, political opinion, etc.
- 3.2. On the Platform registration page, anonymous data collected from the mandatory fields that are marked with an asterisk (*) and non-mandatory fields that are not marked, will not be consolidated with any personal data that may be processed to purchase paid content. Such anonymous information covers gender, birth year and country of residence information. Your access to the Platform may be fully or partially restricted if the mandatory fields are not completed.
- 3.3. In addition to the anonymous data collected on forms while accessing the Platform, other data that may be sought and/or shared during the use of the Platform are processed as part of your use of the Platform. Your choices for the purchase of paid content, i.e. payment information (credit card holder name and surname, hashed credit card information), contact information (e-mail), information on your use and choices regarding the products offered and your requests, complaints and feedback regarding the Platform fall within this scope.

- 3.4. If paid content is purchased through Pegasus website, mobile applications and other Pegasus sales channels, payment and payment related personal data is processed solely by Pegasus as the data controller. If paid content is purchased on the aircraft through the Platform, payment and payment related personal data is processed solely by Immfly as the data controller.
- 3.5. In addition to the above, we collect aggregated/anonymous information regarding your activities regarding the use of the Platform.

4. PURPOSES AND LEGAL BASIS FOR PROCESSING

- 4.1. In connection with your use of the Platform, your personal data will be processed in accordance with the purposes and legal basis described in the following table:

Purposes for Processing and Transferring Personal Data	Processed Data Category	Legal Basis Applicable for Processing for the Stated Purpose
Providing access to the Platform and the free-content products and services made available on the Platform, registration of the user with the Platform, provision of requested content on the Platform, delivering the technical infrastructure of the Platform to the user.	Anonymous Data	No personal data is processed for access to free content on the Platform.
Providing access to paid content on the Platform and the paid-content products and services made available on the Platform, provision of requested content on the Platform, delivering the technical infrastructure of the Platform to the user.	Payment Information, Contact Information	Based on your request to purchase paid content on the Platform, a contractual relationship is formed between the user and the data controllers. Your personal data may be processed to the extent necessary for the formation and the execution of obligations under the contractual relationship.
Management and improvement of the Platform's functioning. For example, we analyze which sections are preferred and which content is most viewed to help further develop and improve the Platform. Receipt of your requests, complaints and feedback regarding the Platform and the response process is another example.	Product Use and Customer Choice, Customer Requests and Complaints	Data controllers have legitimate interest in understanding choices of Platform users and to use statistical data to improve the Platform in order to achieve efficient services and enhance customer satisfaction. Likewise, efficient request and complaint management will produce improved customer satisfaction. When achieving the said purpose, the fundamental rights and freedoms of data subjects are not violated. To achieve this, functioning efforts are carried out based on anonymous data obtained during registration unless paid content is separately purchased.
Personalizing user experience for the purpose of providing content we believe that will be of your interest on the Platform and as part of Platform communication.	Product Use and Customer Choice	Data controllers have legitimate interest in providing users with most relevant content among a wide variety of subjects and in order to achieve efficient services and enhance customer satisfaction. When achieving the said purpose, the fundamental rights and freedoms of data subjects are not violated. To achieve this, personalization is carried out based on anonymous data obtained during registration unless paid content is separately purchased.

<p><u>If you separately provide your consent and so long as you do not withdraw such consent</u>, based on your choices, we will use your information to contact you in order to inform you of other products and services through the Platform, including the content provided by the Platform Sponsors, or by Pegasus. You may withdraw your previously granted consent regarding such communication on behalf of Immfly by unsubscribing by e-mail to unsubscribe@immfly.com, or on behalf of Pegasus by filing a withdrawal request using the Pegasus Website E-Bulletin Unsubscribe Form.</p>	<p>Identification Information, Contact Information</p>	<p>We will rely on your consent to process your personal data for direct marketing activities. In the absence or withdrawal of your consent, we will not process your personal data for this purpose.</p>
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<p>Use of systems and services provided by third party service providers abroad for data hosting and data management in connection with your use of the Platform.</p>	<p>Payment Information, Product Use and Customer Choice, Customer Requests and Complaints</p>	<p>International transfer of your personal data may be required for accessing paid content on the Platform and purchasing such content on the Platform directly from Immfly. Immfly will rely on your consent for the international transfer of your personal data. On the other hand, data controllers have legitimate interest in providing the Platform infrastructure to the users in the most efficient manner possible. When achieving the said purpose, the fundamental rights and freedoms of data subjects are not violated. To achieve this, personally identifiable data is obtained only when paid content is separately purchased.</p>
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5. THIRD PARTY RECIPIENTS OF PERSONAL DATA AND INTERNATIONAL TRANSFERS

- 5.1. For the purpose of providing you the Platform services and its content, and subject to your consent for the international transfer of your data for the purposes stated in the consent checkboxes, your personal data may be transferred to third parties. Your personal data may also be shared with companies offering services for data processing, responding to your requests and orders, carrying-out payment transactions, management and improvement of customer data, providing customer support, evaluating your appreciation of the products and services offered on the Platform, performing customer research and surveys and alike. These third parties will act as the data controllers' processors, or sub-processors at the instructions and on behalf of the data controllers, and will have implemented appropriate safeguards to protect your personal information.
- 5.2. Your personal data will be shared with official authorities in the presence of a legal obligation, due judicial process, litigation and/or request by an authorized administrative of judicial body. Your personal data may be disclosed to administrative or judicial bodies if necessary to enforce Immfly Terms and Conditions regarding the Platform or the protection of operations or users. Your personal data may also be disclosed to third parties involved in a corporate restructuring, merger or sale.
- 5.3. Since Immfly provides services through servers established in Spain, your data will be transferred abroad under the conditions specified in this Privacy Policy, so that you can purchase paid content. Platform service is provided on servers belonging to Data Controller Immfly. The purchase of paid content through Pegasus sales channels does not result in your personal data being shared with Immfly or transferred abroad.

6. YOUR RIGHTS REGARDING YOUR OWN PERSONAL DATA

- 6.1. You can always apply to the data controllers to: (a) understand if your personal data is processed; (b) request information on the processing of your personal data, (c) understand the purpose of processing for your personal data and whether these are used in line with this purpose; (d) know third parties to whom your personal data is transferred in Turkey and abroad and to inquire about the appropriate safeguards implemented for cross-border personal data transfers; (e) correct your incomplete or incorrect personal data processed and maintained; (f) request the destruction or anonymization of your personal data subject to the purposes for the processing of your personal data being fully exhausted; (g) have third parties notified of the transactions covered in items (e) and (f), (h) object to the results of any analysis of your personal data exclusively through automatic systems. Your applications can be submitted to the relevant data controller at the contact means provided in Section 2 above in accordance with the application methods prescribed in Article 5 of the Communiqué on the Procedure and Principles Regarding Applications Filed with Data Controllers.
- 6.2. We will resolve your inquiry at the earliest opportunity and in any event within thirty days.
- 6.3. You must provide the data controllers accurate and complete information to enable the offer of Platform services and the improvement of your user experience. If you suspect that your data held by the data controllers is not correct, please notify us so that the necessary correction can be made. Please note that you will be responsible for any loss incurred by the data controllers and/or Sponsors and Service Providers arising from an incorrect or inappropriate disclosure made by you.

7. OTHER MATTERS

- 7.1. Please review the general Privacy Policies of the data controllers for information on security measures regarding the Platform services, cookies and internet-based marketing functions and other matters that may be relevant for your personal data. For any questions, please contact the relevant data controller through communication means provided above.
- 7.2. Please review the table below for the cookies implemented on the Platform.
- 7.3. This Privacy Notice was last updated on 08.04.2021.

NECESSARY COOKIES				ANALYTICAL COOKIES			
Necessary cookies are technical cookies that enable core functionalities of the Platform and allow us to remember your chosen preferences.				Analytical cookies are those that allow us to monitor and analyze the behavior of the users in the Platform.			
Cookie name	Purpose	Duration	Owner	Cookie name	Purpose	Duration	Owner
fc48ec645735f17ebb476baf73e095c9	Session token created for a user to keep the session active in the same aircraft.	12 hours	Immfly	Batch	Tracks the user behavior inside one entertainment content in the Platform.	3 hours	Immfly
3b4e6d28ff0b78d28038ffeda8f02680	Session token created to keep the session active in the same aircraft.	12 hours	Immfly	Metric	Tracks the user behavior inside the Platform (click, load, error and consume).	1 year	Immfly

NECESSARY COOKIES				ANALYTICAL COOKIES			
Accepted-cookies	Tracks acceptance of cookies use.	3 hours	Immfly				
temporary-uuid	Unique identifier that we use to track the user's actions for the session. Not stored.	3 hours	Immfly				
Player-popups	Indicates the choice of the user to not see again a player popup.	3 hours	Immfly				
Subscribed_to	Indicates the choice of the user to subscribe to a campaign.	3 hours	Immfly				
Sent-feedback	If the user chooses to submit a feedback form.	3 hours	Immfly				
Section-submitted	If the user choses to submit a request to the Help Center	3 hours	Immfly				