

MEMO  
Subject: Data Protection Regulations

REG No: 04/ONPS/2025  
Rev: 1.0

EFFECTIVE DATE: 20.03.2025

TO: Ground Service Providers and Station Managers  
FROM: Ground Operations Bureau  
ISSUE DATE: 19.03.2025  
REG: 04/ONPS/2025  
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SUBJECT: Data Protection Regulations

Revision list:



Rev. No.	Effectivity	Reason
1.0	20.03.2025	New document

Risk acceptance:

CURRENT RISK INDEX <u>before</u> <u>change</u>		PROJECTED RISK INDEX <u>after</u> <u>change</u>		ACCEPTANCE AUTHORITY (includes acceptance of Risk)	
CRITICAL		CRITICAL		Name	Sebastian Jadczyk
SERIOUS		SERIOUS		Position	Ground Operation Nominated Person
MODERATE	X	MODERATE		Signature	e-mail approval
LOW		LOW	X	Date	19.03.2025

Approval notice:

	Name	Function	Date
Prepared by:	Monika Zych	Ground Operation Quality and Training Manager	19.03.2025
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Approved by:	Sebastian Jadczyk	Ground Operations Nominated Person	19.03.2025

 A STAR ALLIANCE MEMBER 	MEMO Subject: Data Protection Regulations	REG No: 04/ONPS/2025 Rev: 1.0
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Dear Ground Service Providers and Station Managers,

We would like to remind you of the strict obligation to comply with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as repealing Directive 95/46/EC (General Data Protection Regulation – **GDPR**).

1. One of the key aspects of data protection is ensuring its accuracy and up-to-date status. Therefore, you must always verify that the entered data corresponds with the provided document and is free from spelling mistakes and typographical errors.
2. If you have any doubts, please re-verify the accuracy of the data with the passenger, especially when the information is obtained via a phone call. Particular attention should be paid to the correctness of email addresses - ensure that they contain the correct domain and do not include unnecessary spaces or additional characters.
3. It is strictly **PROHIBITED** to create private groups on messaging apps, such as Messenger, for the purpose of sharing passenger information.
4. Additionally, if, in exceptional cases, such as an urgent operational situation or document-related concerns, you receive a photo containing passenger data, it must be deleted immediately after consulting with the carrier or entering the data into the system.
5. Incorrect data or unauthorized disclosure may result in legal liability, including significant financial penalties, as well as serious disruptions to operational processes and customer service. It may also negatively impact to our customer trust.

**Due to the fact that LOT Polish Airlines is registered business within the European Union, the above applies to all subcontractors, including those from outside the European Union.**

Please remember that any detected irregularities or cases of non-compliance with data protection rules must be immediately reported to the Data Protection Officer at: [IOD@LOT.PL](mailto:IOD@LOT.PL).

Thank you for your attention and cooperation to this matter.

Best regards,  
Ground Operations Bureau