

GDPR International Transfer Policy

Owner: Data Protection — LIMITLESS SKY & SEA LLC **Scope:** Personal data of EEA, Swiss and UK data subjects processed by Limitless Sky in the United States or in any third country.

1. Why this policy exists

Limitless Sky is established in the United States and processes personal data of EEA, Swiss and UK residents (charterers, passengers, prospects, vendor contacts) when they engage with thelimitlessky.com or contract for a charter. Under Art. 3(2) GDPR and the Swiss FADP and UK GDPR, EU/CH/UK rules apply to that processing. International transfers to the US are governed by Chapter V GDPR (and equivalents).

2. Lawful basis for processing

Data	Lawful basis	Notes
Name, contact, payment details	Art. 6(1)(b) contract	Necessary to arrange and execute the charter.
Passport, DOB, nationality (manifest)	Art. 6(1)(b) contract + Art. 6(1)(c) legal obligation	Shared with operator, ground handlers, customs/border authorities.
Medical / dietary preferences	Art. 9(2)(a) explicit consent	Captured by a separate consent prompt in the booking flow.
Marketing to existing clients	Art. 6(1)(f) legitimate interest (with LIA on file)	Documented opt-out in every message.
Marketing to new prospects	Art. 6(1)(a) consent	Double opt-in.
AML / KYC records	Art. 6(1)(c) legal obligation; Art. 6(1)(f) legitimate interest	Banking partner requirements.

3. Transfer mechanism

Transfers of personal data from the EEA, Switzerland or the UK to the United States rely on one of:

- 1 **EU-US Data Privacy Framework (DPF)** — Commission Decision C(2023)4745 of 10 July 2023, plus UK Extension and Swiss-US DPF where applicable; Limitless Sky self-certifies and re-certifies annually via the US Department of Commerce.

- 2 **Standard Contractual Clauses (SCCs)** — Commission Decision (EU) 2021/914, modules 1 and 2 as appropriate, with a Transfer Impact Assessment ("TIA") on file. Used where the recipient is not DPF-certified.

A change of transfer mechanism (for example a successful Schrems III challenge) is implemented within 90 days of the underlying event.

4. EU representative (Art. 27 GDPR)

Limitless Sky appoints an EU representative in writing in one of the EU Member States where its clients are located. The representative's name, address and contact email are listed in the Privacy Notice and on every commercial communication with EEA recipients.

5. Privacy notice content

The Privacy Notice at thelimitlessky.com/privacy discloses, at minimum:

- Controller identity, US registered address, EU representative.
- Purposes and lawful basis for each processing activity.
- Categories of recipients (operators, ground handlers, payment processors, CRM, e-mail providers, auditors, regulators).
- Cross-border transfer mechanism (DPF or SCCs + TIA).
- Retention schedule (see doc README and sops/09).
- Data subject rights (access, rectification, erasure, restriction, portability, objection, withdraw consent, lodge complaint with a supervisory authority) and how to exercise them — privacy@thelimitlessky.com.

6. Vendor management

Every processor handling EU/CH/UK personal data signs a GDPR Art. 28 / UK DPA / FADP processor addendum, including SCCs where the processor is outside an adequacy area. The vendor list is maintained by the Compliance Officer.

7. Breach handling

Personal data breaches are escalated to the Compliance Officer within 24 hours of detection. Notification to the lead supervisory authority is filed within 72 hours where Art. 33 GDPR triggers; affected data subjects are notified where Art. 34 triggers. The breach register is retained for 5 years.

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