



Blue Ribbon Bags Data & Privacy Policy

Effective: August 18, 2025

1. About This Privacy Policy and Blue Ribbon Bags (BRB)

When Does This Privacy Policy Apply?

This Privacy Policy applies to any identifiable information that Blue Ribbon Bags (BRB) collects from or about you. It applies to all BRB-operated services, including our website (www.blueribbonbags.com) and mobile apps (collectively referred to as the "Services"). It does not apply to anonymous data or third-party websites linked from our platform. We recommend reviewing the privacy policies of any third-party websites you visit through links on our website.

2. Data Controller

The data controller of any personal information collected through www.blueribbonbags.com is:

Blue Ribbon Bags, LLC
10 East 39th Street, Suite 402
New York, NY 10016, USA
E-mail: privacy@blueribbonbags.com

3. Scope & Roles

This Policy explains how Blue Ribbon Bags (BRB) collects, uses, shares, and protects personal data when you use our websites (including www.blueribbonbags.com), apps, support channels, and services (the "Services").

Role clarification

Controller: BRB acts as a controller for personal data collected directly from website/app users and customers.

Processor: For some B2B airline/partner programs, BRB may act as a processor on behalf of those partners; in such cases we follow their instructions and applicable contracts.

4. What We Collect

Identifiers & contact

- Name, E-mail, Phone
 - Service/claim data: booking details, travel itinerary, baggage claim data, service/contract identifiers.
 - Transaction data: purchases, claim payments, limited billing details (processed via payment providers).
- Usage & Device data: IP address, device/browser identifiers, cookie data, approximate location.



- From partners/others: airlines, travel agents, insurance partners provide data needed to deliver Services.

5. Data Use Reason & Legal Basis

Purpose	Examples	Legal Basis
Provide services and process claims	Create service, facilitate services, process claims	Contractual necessity
Customer Support & Communications	Customer support, service notices, incident updates	Legitimate interest
Marketing and promotional updates (with consent)	newsletters, offers	Consent (you may withdraw anytime)
Improve services through analytics	Data analytics, troubleshooting	Legitimate interest
Legal compliance and fraud prevention	tax/audit records, regulatory requests	Legal obligation

We do not use automated decision-making that produces legal or similarly significant effects without human involvement.

6. Sharing & International Transfers

We share data only as needed to run the Services or comply with law.

- Service providers & partners (e.g., airlines, travel agents, payment processors, insurance/booking platforms) under contract and security obligations.
- Legal/governmental authorities when required by law.
- For cross-border transfers (e.g., to the U.S., EU, India), we comply with all regional rules and store data regionally as necessary.

All third parties are contractually obligated to handle your data securely in line with our policies and provide compliance documentation as required.

7. Data Ownership, Governance & Security

Ownership & control

BRB is a caretaker of client data; ownership is determined by contract and client data remains under client control unless the contract states otherwise.

Access controls & governance

- Strict. Access is logged and monitored; data changes/deletions are auditable.
- Regular audits and compliance reviews ensure adherence to GDPR and related regulations.

Security & hosting

- Encryption in transit and at rest.
- Primary data in AWS with backups and lifecycle policies
- Breach notification to affected individuals and authorities where required by law.



8. Retention & Deletion

We keep personal data only as long as needed for the stated purposes or as required by law, then securely delete or anonymize it.

Operational schedule

Data Type	Retention	Deletion
Client / Contract Data	While agreement is active	1 year after termination
Non-essential Data	3 months	Secure deletion
Persistent/Contract-required Data	Up to 1 year	Per contract terms
Systems/Service Logs	Up to 1 year	Lifecycle purge
Backups containing deleted items	—	Removed in next scheduled S3 lifecycle purge

Deletion requests

- Identified personal data is flagged and removed from production systems within 30 days of verification.
- Deletions are logged and auditable; a data destruction report is available upon request.

9. Your Privacy Rights (GDPR)

- Access, correct, erase, restrict, object, and port your data.
- Withdraw consent where applicable.
- Right to lodge a complaint with your local supervisory authority.
- Contact: privacy@blueribbonbags.com. We respond within 30 days. Identity verification is required.

Public guides:

- Access (SAR): <https://www.blueribbonbags.com/en/GDPR/public/customer-data-request>
- Deletion: <https://www.blueribbonbags.com/en/GDPR/public/customer-data-delete>

10. Cookie Types

- Essential (authentication, security, core features)
- Marketing/Targeting (optional)

Manage cookies in your browser and via our GDPR on-site Cookie Preferences panel. Disabling essential cookies may impact functionality.

11. California Privacy (CCPA/CPRA)

- Categories collected: provided identifiers, customer provided commercial info, site activity, approximate geolocation, and limited inferences as described in this Policy.
- Sources: You, your devices, our partners and service providers.



- Sale / Share: BRB does not sell personal information. If we “share” data via marketing cookies for cross-context behavioral advertising, you can opt out via “Do Not Sell or Share My Personal Information” and Cookie Preferences.
- CCPA requests: privacy@blueribbonbags.com.

12. Applicability to Children

Our Services are not directed to children under 16, and we do not knowingly collect their personal data without appropriate consent as required by law.

13. Changes to This Policy

We may update this Policy periodically. We’ll change the Effective date above and, when appropriate, notify you.

14. Contact

Blue Ribbon Bags, LLC
10 East 39th Street, Suite 402
New York, NY 10016, USA
E-mail: privacy@blueribbonbags.com



15. Appendix A: Data Requests (Customer & Employee Procedures)

A1. Subject Access Requests (SAR)

How to request your data (customers):

1. Prepare your request: Full Name, Email Address (used with BRB), Phone (optional), Service Number(s) and/or Missing Bag Reference Number(s) if applicable.
2. Send email to: gdpr-data@blueribbonbags.com or privacy@blueribbonbags.com.
3. Identity verification: respond to our verification email; you may redact sensitive fields on government ID.
4. Response time: BRB will respond within 30 days (extendable per law for complex requests).
5. Delivery: we will provide your data via secure link or attachment.

Suggested email format:

Subject: GDPR Data Request

Dear Blue Ribbon Bags,

I am writing to request access to my personal data under the GDPR. My details are below:

Full Name: [Your Full Name]

Email Address: [Your Email Address]

Phone Number: [Optional]

Service Number(s): [If available]

Missing Bag Reference Number(s): [If available]

Thank you,
[Your Name]

Public guide: <https://www.blueribbonbags.com/en/GDPR/public/customer-data-request>



A2. Data Deletion Requests (Right to be Forgotten)

How to request deletion (customers):

1. Prepare your request: provide identifiers (Full Name, Email Address used with BRB, optional Phone) and any Service/Bag Reference numbers.
2. Send email to: gdpr-delete@blueribbonbags.com or privacy@blueribbonbags.com.
3. Identity verification is required. We may request confirmation from the email on file.
4. Processing time: BRB processes verified deletion requests within 30 days (unless retention is required by law).
5. If some data must be retained (e.g., tax/audit records), we will explain the legal basis.
6. Upon completion, we can provide a data destruction report upon request.

Suggested email format:

Subject: GDPR Data Deletion Request

Dear Blue Ribbon Bags GDPR Team,

I am requesting deletion of my personal data under the GDPR. My details are below:

Full Name: [Your Full Name]

Email Address: [Your Email Address]

Phone Number: [Optional]

Service Number(s): [If available]

Missing Bag Reference Number(s): [If available]

I understand certain data may need to be retained for legal or regulatory purposes.
Please confirm once deletion is complete.

Thank you,
[Your Name]