Privacy Policy

Version 1.1, 10 November 2026

In short: We use your personal data to book your journey, deliver your tickets and help you if your plans change. We share passenger details with the train and bus companies that issue your tickets. Our own systems are hosted in the EU, and we never sell your data.

1. Who we are

All Aboard AB is the controller of the personal data described in this policy. This means we decide why and how that data is used.

- Company registration number: 559214-7671
- Registered address: Kivra 559214-7671, 106 31 Stockholm, Sweden
- Privacy contact: security@allaboard.eu

All Aboard is a booking platform for train and bus travel in Europe. We do not operate any trains or buses. Each journey is run by an operator under its own conditions of carriage.

2. When this policy applies

Bookings made directly with us. This policy applies to everything we do with your personal data when you search, book, pay or contact us on allaboard.eu or through our own booking tools.

Bookings made through a travel agent. Many travel agents and other businesses book through our API, dashboard or booking widgets. For these bookings, the agent decides how your data is used and we process it on the agent's behalf. The agent's privacy policy applies, and you should contact the agent first with any questions. We remain the controller for a small number of activities that we carry out for our own purposes, and this policy covers them:

- processing payments made through All Aboard Payments
- security logging and fraud prevention
- keeping the booking records that the law requires us to keep

3. The data we collect

Most of the data we hold comes from you when you make a booking or contact us. Some of it comes from operators, from our payment provider or from the travel agent you

booked through.

- **Contact details:** name, email address and phone number.
- **Passenger details:** the names of everyone travelling, date of birth or age where a fare or pass depends on it, passport or ID number where an operator requires it, and any discount or loyalty card numbers you add.
- **Booking details:** routes, travel dates, tickets, passes, seats, prices, booking history, refunds and exchanges.
- **Payment details:** payment method and the status of the transaction. Your full card number goes directly to Stripe and never reaches our systems.
- **Assistance needs:** wheelchair space or other assistance that you ask us to book (see section 5).
- **Support conversations:** messages, emails and attachments you send us.
- **Technical data:** IP address, browser and device type, and the actions you take in our services.
- **Newsletter data:** email address, first name, and whether you open our emails and click the links in them.

We need your contact, passenger, booking and payment details to complete a booking. Without them, we cannot book or issue your tickets.

4. How we use your data and why

We use your data only for specific purposes, and each purpose has a legal basis under the General Data Protection Regulation (GDPR).

To perform our contract with you (Article 6(1)(b) GDPR)

- booking, issuing and delivering your tickets and passes
- handling changes, refunds and exchanges
- taking payment
- informing you of delays, cancellations and timetable changes that affect your journey
- answering questions and complaints about your booking

With your consent (Article 6(1)(a) GDPR, and Article 9(2)(a) GDPR for assistance needs)

- booking wheelchair space or other assistance with the operators
- sending you our newsletter

For our legitimate interests (Article 6(1)(f) GDPR)

- detecting and preventing payment fraud and misuse of our services
- keeping our services secure and working properly

- answering questions that do not concern a booking
- improving our services based on aggregated statistics
- establishing, exercising or defending legal claims

To comply with the law (Article 6(1)(c) GDPR)

- keeping accounting records under the Swedish Accounting Act (bokföringslagen)
- responding to lawful requests from public authorities

Where we rely on consent, you may withdraw it at any time. Where we rely on our legitimate interests, we have weighed those interests against your right to privacy, and you have the right to object (see section 11).

We do not sell your data, and we do not use it to train AI models.

Stripe automatically screens every card payment for fraud and may decline a payment it considers high risk. If your payment is declined, contact us and a member of our team will review it.

5. Assistance needs

Information about a disability or a need for assistance is a special category of personal data under the GDPR. We collect it only when you ask us to book wheelchair space or other assistance, and only with the explicit consent we ask for at that point.

We use this information to arrange the assistance with the operators on your route, and keep it for 12 months after your last travel date to handle any related claims (see section 9). We do not use it for anything else. You may withdraw your consent at any time. We then delete the information unless we need it for an ongoing claim, and the operator may be unable to provide the assistance.

6. Booking for other people

When you book for other people, you give us their names and other passenger details. Please make sure they know that you are sharing their details with us, and refer them to this policy. They have the same rights as you under section 11.

7. Who we share your data with

Companies that need your data for your journey. These companies use your data as independent controllers under their own privacy policies.

- **Operators.** The train and bus companies on your route receive the passenger details they need to issue tickets, check them on board and provide assistance.
- **Distribution partners.** We book many tickets and passes through national and international rail distribution systems, which pass your details on to the operators.
- **Your travel agent.** If you booked through a travel agent, the agent can see your booking.
- **Stripe.** Stripe processes your payment. It also uses some of your data as a controller in its own right to prevent fraud and to meet its obligations under financial regulation.

Service providers that work for us. These providers process your data on our behalf and may only use it as we instruct.

- **UpCloud Oy** (Finland): hosting of our systems and database. Data is stored in Frankfurt, Germany.
- **Cloudflare, Inc.** (United States): network, security and content delivery, and running our website. Data passes through the Cloudflare data center closest to you, which may be outside the EU. Cloudflare stores sign-in sessions for up to 90 days and keeps limited logs for security purposes.
- **Stripe Payments Europe, Limited** (Ireland): payment processing. Stripe transfers data to Stripe, LLC in the United States.
- **Better Stack** (HODL s.r.o., Czech Republic): logging and monitoring. Data is stored in Frankfurt, Germany.
- **Anthropic** (Anthropic Ireland, Limited, Ireland): AI assistants our staff use to investigate bookings and answer support cases. They read booking records, including passenger details. Data may be processed outside the EU, and Anthropic is contractually barred from using it to train its models.
- **Plausible Insights OÜ** (Estonia): cookie-free website statistics. Data is stored in Falkenstein, Germany.
- **Loops** (Astrodon Corporation, United States): newsletter emails. Data is stored in the United States.
- **Postmark** (ActiveCampaign, LLC, United States): emails with tickets, booking confirmations and journey updates. Data is stored in the United States, and email content is kept for 45 days.
- **Intercom** (Intercom R&D Unlimited Company, Ireland): customer support chat and conversations. Data is stored in the United States.

Authorities and legal matters. We disclose data to the police, courts and other public authorities where the law requires us to do so. We may also share data with insurers, professional advisors or opposing parties where this is necessary to establish, exercise or defend a legal claim.

Business transfers. If All Aboard merges with or is acquired by another company, your data may be transferred to the new owner, who will continue to handle it under this policy.

8. Transfers outside the EU/EEA

Our own systems and database are in the EU, but some of your data is transferred outside the EU/EEA. Stripe, Postmark, Loops and Intercom process data in the United States. Cloudflare handles data in the data center closest to you, and Anthropic may process data outside the EU. Operators outside the EU/EEA receive passenger details when your journey takes you there. Each transfer is protected by the following safeguards:

- **Operators and partners in the United Kingdom or Switzerland:** an adequacy decision by the European Commission.
- **Operators in other countries outside the EU/EEA, bookings made directly with us:** the transfer is necessary to perform our contract with you (Article 49(1)(b) GDPR).
- **Operators in other countries outside the EU/EEA, bookings made through a travel agent:** we have no contract with you, and the transfer is necessary to perform a contract concluded in your interest (Article 49(1)(c) GDPR).
- **Stripe (United States):** the EU-US Data Privacy Framework and the European Commission's standard contractual clauses.
- **Cloudflare (United States):** the EU-US Data Privacy Framework and standard contractual clauses.
- **Loops (United States), newsletter subscribers only:** the EU-US Data Privacy Framework.
- **Postmark (United States), booking and ticket emails:** standard contractual clauses.
- **Intercom (United States), support conversations:** the EU-US Data Privacy Framework and standard contractual clauses.
- **Anthropic, AI assistants for our staff:** standard contractual clauses in Anthropic's data processing addendum.

You can ask us for a copy of the safeguards that apply to your data.

9. How long we keep your data

We keep personal data only for as long as we need it for the purpose for which it was collected. After that, we delete or anonymize it.

- **Accounting records** (booking reference, passenger names, what was bought, amounts, dates and payment details): 7 years after the end of the calendar year in which the booking was made, as required by the Swedish Accounting Act.
- **Date of birth, passport or ID numbers, discount card numbers and assistance needs:** 12 months after your last travel date, so that we can handle refunds, complaints and claims about your journey. After that, we delete them.
- **Support conversations:** 24 months after the matter is closed.
- **Logs and technical data:** 12 months.

- **Newsletter data:** until you unsubscribe. After that, we keep only your email address on a suppression list so that we do not email you again.

If a dispute, chargeback or legal claim is ongoing, we keep the data we need until it has been resolved.

10. Cookies and analytics

We do not use advertising cookies or cookies that track you across other websites.

Our website statistics come from Plausible, which uses no cookies and does not identify individual visitors.

We only use cookies and similar technologies that are strictly necessary for our services to work:

- to keep your search and booking in progress
- to protect the website against attacks (Cloudflare)
- to prevent fraud at checkout (Stripe)

Our newsletter emails contain a small image that tells us whether an email has been opened, and links that tell us whether they have been clicked. You can prevent this by blocking images in your email program or by unsubscribing.

11. Your rights

Under the GDPR, you have the right to:

- access the personal data we hold about you and receive a copy of it
- have inaccurate or incomplete data corrected
- have your data erased, unless we are required by law to keep it
- restrict our use of your data, for example while we check a correction you have asked for
- receive the data you have given us in a machine-readable format and have it transferred to another company
- object to our use of your data where we rely on our legitimate interests. You may always object to direct marketing, and we will then stop.
- withdraw your consent at any time. This does not affect our use of your data before you withdrew it.

To exercise any of these rights, email security@allaboard.eu. There is no charge. We will reply within one month. If your request is complex, we may need up to two further months,

and in that case we will tell you why within the first month. We may ask you to confirm your identity before we act on your request.

If you booked through a travel agent, please contact the agent first. We will forward any request we receive that concerns a booking made through an agent.

12. Complaints

If you are unhappy with how we handle your personal data, please contact us first. You also have the right to lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten, IMY) at imy.se, or with the data protection authority in the country where you live or work.

13. Children

We receive children's data when an adult books a journey for them. We do not knowingly allow children to make bookings themselves.

14. Changes to this policy

We update this policy when our services or the law change. The date at the top shows when it was last updated. If a change materially affects how we use your data, we will notify you by email or on our website before the change takes effect.

15. Contact

All Aboard AB Kivra 559214-7671 106 31 Stockholm, Sweden **security@allaboard.eu**