

Privacy Notice

How Flightagram processes personal data.

Effective from: 6 May 2026 · **Version:** 2.1 · **Replaces:** waitlist Privacy Notice dated 5 November 2025.

This Notice explains what personal data Flightagram processes, why we process it, who we share it with, how long we keep it, and the rights you have. It is written to comply with the EU General Data Protection Regulation (GDPR, Regulation (EU) 2016/679) and applicable Hungarian law.

1. At a glance

Flightagram is a flight notification service. You add a flight, you give your loved ones a nickname, and we generate a Telegram link you forward to them. When they open the link and start the bot, they receive automatic (pre-configured, editable) flight status messages (boarding, in-flight, landing) on Telegram.

Three things to know upfront:

- **We do not collect your recipients' personal contact details.** You only enter a nickname. The recipient connects to our Telegram bot themselves, by opening a link you choose to share with them.
- **We use processors located outside the EU.** Our backend (Supabase) and hosting (Vercel) operate from the United States; the email-sending service (ZeptoMail) is operated by Zoho from India; Telegram operates from the United Arab Emirates. Transfers are protected by Standard Contractual Clauses or, where available, the EU-U.S. Data Privacy Framework.
- **We do not sell your data and we do not profile you.** Flightagram does not run automated decision-making with legal effects, and we do not share data with advertisers.

2. Who is the controller

The data controller — i.e., the entity responsible for the personal data processed in connection with Flightagram — is:

Dr. Tamás Felicián Sárhegyi, sole proprietor (egyéni vállalkozó)

- **Registered seat:** 5123 Jászárokszállás, Deák Ferenc u. 26, Hungary
- **Tax ID:** 91528072-1-36
- **Business registration number:** 91528072
- **Registering authority:** Budapest Chamber of Commerce and Industry
- **Email:** hello@flightagram.com
- **Website:** https://flightagram.com

References to “we”, “us” or “Flightagram” mean the controller above. We have not appointed a Data Protection Officer because we are not legally required to do so; for any privacy question please write to **hello@flightagram.com**.

3. What this Notice covers

This Notice applies to personal data we process when you:

- visit flightagram.com (and flightagram.hu, which redirects to flightagram.com);
- create or use a Flightagram account;
- add a flight, configure recipients, or send Telegram-based flight notifications through our service;
- interact with our blog at blog.flightagram.com (which runs on the WordPress platform and has its own cookie banner);
- contact us by email; or
- interact with us in any other way related to the service.

It does not cover third parties that are linked from but not operated by Flightagram (for example, Telegram itself, the websites of airlines, or other apps your recipients use). When you click an external link, the privacy notice of that third party will apply.

4. Key terms

Term	Meaning
Sender / User	The natural person who creates a Flightagram account, adds a flight and configures notifications. The Sender is the primary data subject for account-related data.
Recipient	A person to whom the Sender forwards a Flightagram Telegram link. A Recipient becomes a data subject for our purposes only after they voluntarily open the link and start the Telegram bot.
Trip	A configured combination of a flight number, channel, and one or more nicknamed recipients.
Telegram bot	The Flightagram bot account on Telegram via which automated flight status messages are delivered.
Processor	A third party that processes personal data on Flightagram's behalf and on its instructions (also called sub-processor).

5. What personal data we process and why

We deliberately keep data minimal. The table below lists the categories of personal data we process, the purpose, and the legal basis under Article 6 GDPR.

Category	What it includes	Why we process it	Legal basis
Account data	Email address; authentication metadata (e.g., login tokens, session identifiers, hashed passwords if applicable); account	To create and operate your account, authenticate you, and let you manage your trips.	Performance of a contract with you (Art. 6(1)(b) GDPR).

Category	What it includes	Why we process it	Legal basis
	creation date; language preference.		
Trip configuration	Flight number; departure and arrival airports and times retrieved from the flight data API; the nickname you choose for each recipient; the message tone you select; any custom edits you make to the default message library.	To run the notification service: monitor the flight, build the messages, and dispatch them at the right moments.	Performance of a contract (Art. 6(1)(b)).
Recipient data (limited)	The Telegram chat ID and Telegram username (visible to us once the Recipient starts the bot); the nickname you assigned to that Recipient; messages we deliver to that chat.	To deliver flight status messages to the right Telegram chat.	Our legitimate interest in operating the service the Sender requested (Art. 6(1)(f)). See Section 9.
Technical and log data	IP address; user agent; HTTP request metadata; error and access logs.	To keep the service secure and stable, prevent abuse, and debug incidents.	Legitimate interest in the security and integrity of the service (Art. 6(1)(f)).
Bot and abuse prevention	When you submit forms that are exposed to abuse (e.g., sign-up, sign-in, contact), Cloudflare Turnstile	To protect the Service against automated attacks, fake accounts, and spam.	Legitimate interest in the security and integrity of the service (Art. 6(1)(f)).

Category	What it includes	Why we process it	Legal basis
	processes your IP address, user-agent string, TLS fingerprint, the protected sitekey, and other browser-side signals to distinguish humans from automated bots. In its standard configuration Turnstile does not set cookies.		
Cookies and similar	Strictly necessary cookies (session, security); statistics and preference cookies subject to your consent, including Google Analytics 4 on flightagram.com and blog.flightagram.com. Managed via Cookiebot.	Strictly necessary: to operate the site. Optional: analytics and preferences.	Strictly necessary: legitimate interest (Art. 6(1)(f)) and ePrivacy exception. Optional: consent (Art. 6(1)(a)).
Communications with us	The content of emails you send to hello@flightagram.com, including any personal data you choose to share.	To answer your questions, handle complaints, and improve the service.	Legitimate interest in user support (Art. 6(1)(f)); legal obligation where it applies (Art. 6(1)(c)).
Billing data (if introduced)	If we introduce paid plans: billing name, billing address, country, VAT number where applicable, the amount	To process payments and issue lawful invoices.	Performance of a contract (Art. 6(1)(b)); legal obligation under tax law (Art. 6(1)(c)).

Category	What it includes	Why we process it	Legal basis
	and currency of the transaction, and an invoice number. Card data is never seen by us; it is handled by the payment processor.		(c)).

We do not currently process special categories of personal data (e.g., health, biometric, political opinions). The service is offered free of charge at the time of this Notice; usage limits — such as a maximum number of tracked flights per day — are enforced in the application.

6. Automated decision-making and profiling

We do not make decisions about you based solely on automated processing that produces legal effects or similarly significantly affects you. The selection of which message to send for a given flight event is a routine, technical operation; it is not profiling in the sense of Article 22 GDPR.

7. Processors and recipients of personal data

We rely on a small set of carefully selected service providers to operate Flightagram. Each of them processes personal data only on our written instructions, under a data processing agreement that includes the safeguards required by Article 28 GDPR.

Provider	Country	Role	Transfer mechanism
Supabase Inc.	United States (EU region used where available)	Backend platform: database, authentication, and registration / sign-in emails sent through Supabase's built-in email infrastructure.	EU Standard Contractual Clauses; EU-U.S. Data Privacy Framework where applicable.

Provider	Country	Role	Transfer mechanism
Vercel Inc.	United States	Application hosting and edge delivery.	EU Standard Contractual Clauses; EU-U.S. Data Privacy Framework where applicable.
Cloudflare, Inc.	United States	Bot and abuse protection on forms (Cloudflare Turnstile). Used in its standard, cookie-free configuration.	EU Standard Contractual Clauses; EU-U.S. Data Privacy Framework (Cloudflare appears on the official participant list).
Zoho Corporation (ZeptoMail)	India / United States	Other transactional email delivery (service notifications, alerts) sent from the application; registration / sign-in emails are handled separately via Supabase.	EU Standard Contractual Clauses.
Telegram FZ-LLC	United Arab Emirates	Delivery of flight status messages via the Flightagram bot.	EU Standard Contractual Clauses; the Recipient's interaction with Telegram is also governed by Telegram's own privacy policy.
Google Ireland Limited / Google LLC	Ireland / United States	Web analytics on flightagram.com and blog.flightagram.com (Google Analytics 4). Loaded only after you accept statistics cookies	EU Standard Contractual Clauses; EU-U.S. Data Privacy Framework where applicable; loaded subject to your consent.

Provider	Country	Role	Transfer mechanism
		in the Cookiebot banner.	
AeroDataBox	EU	Flight data API (departure, arrival, status). Only flight numbers are queried; no personal data is sent.	No personal data transferred.
Cookiebot (Usercentrics A/S)	Denmark	Cookie consent management on flightagram.com.	EU–EU; processing within the EU/EEA.
Namecheap, Inc.	United States	Domain registrar for flightagram.com.	EU Standard Contractual Clauses.
DotRoll Kft.	Hungary	Domain registrar for flightagram.hu (which redirects to flightagram.com).	EU–EU; processing within the EU/EEA.
WordPress / blog hosting provider	See blog.flightagram.com cookie banner	Hosting of the public blog at blog.flightagram.com . The blog is logically separate from the application; visitors are subject to a dedicated cookie banner there.	Where applicable, EU Standard Contractual Clauses.

We do not sell personal data, we do not share it with advertisers, and we do not transfer it to any other third party except where required by law (e.g., a binding request from a competent authority).

8. International data transfers

Where a processor is located outside the European Economic Area, the transfer is protected by appropriate safeguards under Chapter V of the GDPR, namely:

- the EU Standard Contractual Clauses approved by the European Commission (Decision 2021/914);
- for transfers to certified U.S. recipients, the EU–U.S. Data Privacy Framework adequacy decision; and
- supplementary technical and organisational measures where the risk assessment indicates they are necessary (e.g., encryption in transit and at rest).

You can request a copy of the safeguards we rely on by writing to hello@flightagram.com. We may need to redact commercially sensitive information.

9. Recipients as data subjects

Flightagram is built so that we never receive your Recipient's phone number, email address or other personal contact details from you. This is intentional: it minimises the data we hold about people who are not our direct users.

In practice the flow is:

1. You add a Trip and choose a nickname for each Recipient (e.g., “Mom”).
2. Flightagram generates a unique Telegram link bound to that Trip and Recipient slot.
3. You forward the link to the Recipient through any channel of your choice.
4. If the Recipient opens the link and starts the Telegram bot, Telegram shares with us a chat ID (and, depending on the Recipient's Telegram settings, a username and first name). We use these only to deliver the messages you configured.

When the Recipient starts the bot they receive a short welcome message describing what Flightagram is, who runs it, how to find this Notice, and how to stop receiving messages by sending `/stop`. From that moment they are a data subject and can exercise the rights described in Section 12 directly with us.

Your responsibility as Sender. Before you forward a Flightagram link, you must be reasonably sure that the Recipient wants to receive automated messages about your flight. The Terms of Service set out this responsibility in more detail.

10. How long do we keep personal data

We keep personal data only for as long as it is needed for the purposes described above, plus any retention period required by law.

Category	Retention period	Reason
Account data	For as long as the account exists; deleted within 30 days after you delete the account.	The data is needed to operate your account.
Trip configuration and message history	12 months after the flight has taken place, then deleted or anonymised.	A 12-month window allows you to review past trips and helps us debug issues for a reasonable period.
Recipient chat ID and nickname	For the lifetime of the linked Trip + 12 months, or until the Recipient sends /stop or the Sender removes the Recipient from the Trip, whichever is earlier.	Allows ongoing trip use; respects the Recipient's choice to opt out.
Technical and log data	Up to 30 days, except security-incident logs which we may keep up to 12 months.	Operational debugging, incident response, fraud prevention.
Email correspondence	Up to 5 years from the last message.	Aligned with the Hungarian general civil-law limitation period (Art. 6:22 of Act V of 2013, the Civil Code).
Billing data (if introduced)	8 years.	Required by Hungarian tax and accounting law (Act C of 2000).

Category	Retention period	Reason
Cookie consent records	12 months, or until you change your preferences.	To prove your consent under Art. 7(1) GDPR.

11. Security

We implement technical and organisational measures appropriate to the risks of the processing, including:

- encryption in transit (TLS) for all connections to flightagram.com and to our processors;
- encryption at rest for the production database;
- strict access controls based on the principle of least privilege;
- audit logs of administrative actions;
- regular updates of dependencies and infrastructure;
- a documented process for handling personal data breaches in line with Articles 33 and 34 GDPR, including the obligation to notify the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) within 72 hours where required.

No system is perfectly secure. If you become aware of a vulnerability, please report it to hello@flightagram.com.

12. Your rights

Subject to the conditions in Articles 15–22 GDPR, you can ask us to:

- **access** the personal data we hold about you and receive a copy of it;
- **rectify** inaccurate or incomplete personal data;
- **erase** personal data where one of the grounds in Art. 17 GDPR applies (“right to be forgotten”);

- **restrict** processing while we examine a complaint or rectification request;
- **port** the data you provided to us in a structured, commonly used and machine-readable format;
- **object** to processing based on legitimate interest, including direct marketing, on grounds relating to your particular situation;
- **withdraw consent** at any time where processing is based on consent, without affecting the lawfulness of processing before withdrawal.

To exercise any of these rights, write to hello@flightagram.com. We will respond without undue delay and in any case within one month, with a possible extension of up to two further months for complex requests (we will let you know if we need it). The exercise of these rights is free of charge unless your request is manifestly unfounded or excessive.

Right to lodge a complaint. If you believe we are processing your personal data unlawfully, you may file a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

- **Address:** 1055 Budapest, Falk Miksa u. 9–11, Hungary
- **Postal:** 1363 Budapest, Pf. 9
- **Email:** ugyfelszolgalat@naih.hu
- **Website:** <https://naih.hu>

You can also lodge a complaint with the supervisory authority of your habitual residence, place of work or place of the alleged infringement.

13. Children

Flightagram is not specifically directed at children. We do not knowingly collect personal data from children under the age at which a child can lawfully consent to digital services in their country. If you believe a child has shared personal data with us without appropriate consent, please contact us at hello@flightagram.com and we will delete it.

14. Changes to this Notice

We may update this Notice from time to time, for instance when we add a new processor or a new feature. The version number and effective date are at the top of this document. If we make material changes we will let you know by email and on the website at least 15 days before they take effect, except where the change is required by law and must take effect sooner.

15. How to contact us

For privacy questions, requests under Section 12, or any other matter related to this Notice:

- **Email:** hello@flightagram.com
- **Postal:** Dr. Tamás Felicián Sárhegyi, 5123 Jászárokszállás, Deák Ferenc u. 26, Hungary

This Notice is published in English and Hungarian. In case of any discrepancy between the language versions, the Hungarian version prevails.