

Personal Data Protection Code of DELUXEA a. s.

This Personal Data Protection Code of DELUXEA a. s. (hereinafter the “Code”) sets out the procedures for the collecting, processing, and use of personal data by DELUXEA a. s. (hereinafter “DELUXEA”) as the data controller. It also regulates the processes of personal data protection, which is our number one priority. We take personal data protection seriously, striving for continuous development in this regard. Personal data obtained from the data subjects are processed by us in accordance with 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, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR); Czech Act No. 110/2019 Coll., on the processing of personal data; Civil Code (Czech Republic); and other related legislation.

Purpose of the processing of personal data

- a) To realise a package tour, we need to know who orders it so that we can provide the best possible care for you and to prevent identity misuse (e.g., when someone else claims to be you);
- b) We need to know the date of birth of children under 12 to verify the child’s age because most tours are offered with discounts for young children; the date of birth is therefore necessary to provide such a discount;
- c) We need to know your e-mail address in order to send you travel instructions, and we need to know your telephone number due to unforeseen changes in the tour organisation (e.g., changes in transportation for certain reasons, changes in the tour organisation due to weather, changes in flight departures, etc.);
- d) Mailing of our catalogues, promotional offers, services.

Partially, this is lawful processing of personal data, where we are unable to conclude a travel contract without your personal data and to fulfil our duties under said contract or duties under contracted services [see a) through c)], and the processing of personal data with your consent, which especially relates to the offering of our services, mailing of catalogues, etc.

For further specifications of the processing of personal data, see Article 4/(2) GDPR.

Extent of personal data processed

Identification data – including, in particular, name; surname; date and place of birth; address of permanent residence; type, number, and validity of an ID card/passport; Business ID number and VAT ID number of natural persons – entrepreneurs. Other identification data include, for instance, IP address of the computer used in case of distance contracts.

Contact information – contact addresses, telephone numbers, e-mail addresses and other similar contact information.

Duration of the Processing of Personal Data

We will only process the data for a period necessary in respect of the purpose of their processing. Should we find out the data are no longer necessary for any of the purposes for which they were processed, we will destroy them.

If personal data were provided based on your consent, we will erase the data after you withdraw your consent to the processing of personal data, and we will be able to process data on granting or withdrawing the consent, for the appropriate period of time. The purpose behind this is to be able to prove the grounds for the processing of data. If a longer duration of the processing of personal data is specified by law, personal data will be processed for the duration required by law. This applies in particular to the accounting law, tax code, act on archiving, etc.

Personal data and third parties

Access to your personal data is restricted to a limited number of third parties, as follows:

- a) Especially the employees of DELUXEA in connection with fulfilling their duties, during which it is necessary to handle personal data of the clients, but only to the extent necessary for each case;
- b) Persons operating information systems, backup servers, and data backups of DELUXEA;
- c) Persons performing legal and economic activities for DELUXEA, including tax advisers and auditors.

Prior to any transfer of your personal data to third parties, we will, in each case, conclude a written contract with said person, in which we will regulate the processing of personal data so that it contains safeguards for the processing of personal data in the same extent as observed by DELUXEA in accordance with obligations imposed by the laws.

In accordance with the relevant legislation, DELUXEA is entitled/required, without your consent, to transfer your personal data:

- to competent government authorities, court of law, and law enforcement authorities for the performance of their duties,
- to other persons in an extent specified by legislation.

Your personal data are processed within the territory of the Czech Republic. For the purpose of performance of the travel contract, DELUXEA transfers personal data (name; surname; telephone number – for the provision of updated information; date of birth – in case of children under 12) to airline companies and accommodation facilities or other companies for the purpose of performance of the travel contract, including non-EU countries. This transfer is necessary for the purpose of performance of the travel contract.

Rights of the customer

As the data controller, we hereby inform you that in addition to your right to refuse consent to the processing of personal data (except legitimate personal data necessary to conclude the travel contract), you also have the right to:

- a) Require access to your personal data that we process. Based on your request, we will provide confirmation whether or not we process personal data concerning you. If said data are processed by us, you have the right of access to them and other information in accordance with Article 15 GDPR;
- b) Require rectification of your personal data if these are not in accordance with the facts. Likewise, you have the right to have incomplete personal data completed, if necessary, so that we process them in their entirety;
- c) Require erasure of your personal data in accordance with Article 17 GDPR. In this respect, you also have the “right to be forgotten” – you need to go to <https://www.deluxea.cz/osobni-udaje/>, enter that you do not want further processing of your personal data and that you require erasure of all your personal data that we process, and confirm this requirement in an e-mail from us;
- d) Require restriction of the processing of personal data in accordance with Article 18 GDPR;
- e) Acquire your personal data in a format which is commonly used, structured, and machine-readable. In accordance with Article 20 GDPR, you have the right to transfer such data to another data controller;
- f) Object to the processing of personal data in accordance with Article 21 GDPR, for reasons concerning your specific situation.

Should you exercise any of the rights mentioned above, we will inform you, without undue delay, but at the latest within 30 days, about any and all measures taken. In justified cases and with respect to complexity and the number of requests, this deadline may be prolonged by no more than 60 days.

Should reasonable doubts about your identity arise upon the receipt of your request, we will have the right to request additional, strictly necessary information from you, based on which we will verify and confirm your identity.

If no measure is taken, we will be required to inform you about this fact without undue delay, but at the latest within 30 days. This information should also include explanation why no measure was taken.

If your request is unfounded or inadequate, we will not be required to satisfy your request, in part or in full, in cases specified in GDPR. At the same time, we will have the right to charge a fee reflecting administrative costs of processing your unfounded or inadequate request.

Also please note that if you believe DELUXEA processes your personal data illegally or that it otherwise infringes your rights, you have the right to lodge a complaint with the supervisory authority – the Office for Personal Data Protection – or to request protection from a court.

Duties of DELUXEA as the personal data controller

DELUXEA as the personal data controller is required to:

- specify the purpose, means, and methods of the processing of personal data,
- process current and accurate personal data in accordance with the purpose of their processing,
- only collect personal data in an extent necessary to achieve the purposes of their collecting,
- only retain personal data for as long as necessary,
- refrain from aggregating personal data for different purposes.

Should the data subject find out or believe the personal data controller processes personal data in violation of the protection of the data subject's private and personal life or in conflict with the law, the data subject can ask the controller for an explanation, or require that the data controller remove such a condition.

Updating personal data

The data subject has the right to check whether personal data provided are accurate and up-to-date. If the data subject's personal data are incomplete, inaccurate, or not up-to-date, the data subject is required to report this fact to the data controller who will provide a remedy.

Notice may be given in writing and sent to the address: DELUXEA a.s., Na příkopě 392/9, 110 00 Praha 1, Czech Republic; or by e-mail to: osobni-udaje@deluxea.cz.

This Code is valid and effective as of 17.05.2018. The current wording of the Code is available at <https://www.deluxea.cz/> as well as at our branches.