

INFORMATION ON THE PROCESSING AND PROTECTION OF PERSONAL DATA BY EXCLUSIVE TOURS S.R.O.

In connection with the provision of the Company's services consisting primarily of tour operator services and the use of the website www.exclusivetours.com (hereinafter referred to as the "Website"), as well as the provision of other services offered by the Company, we process your personal data.

Through this document we want to inform you how and why we process your personal data and what rights you have in this field. When processing your personal data, we follow legal regulations, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of personal data (GDPR), and Act No. 110/2019 Coll., on the processing of personal data, as amended. The protection of personal data is important to us, so we adhere to the highest security standards when processing personal data.

We encourage you to read the information carefully. You can always find the current version of this document on our website at www.exclusivetours.com.

1. Who is the controller of the personal data you have provided?

1.1 The controller of your personal data is Exclusive Tours s.r.o., ID: 27927202, with its registered office at Václavské nám. 47, 110 00 Prague 1, registered in the Commercial Register maintained by the Municipal Court in Prague, file No. C 127039 (hereinafter referred to as the "Company").

2. What categories of personal data do we process?

2.1 If you have entered into a service contract with us, we generally process the following personal data:

- a) name and surname,
- b) address,
- c) citizenship,
- d) passport/similar identification document details, or copies thereof,
- e) date of birth,
- f) sex,
- g) telephone number(s),
- h) e-mail address(es),
- i) if necessary in connection with the service provided, details of social media account(s) or other data necessary for visa arrangement under the terms of the relevant diplomatic missions,
- j) if necessary in connection with the service provided, biometric data (in particular weight and height) (s),

- k) if necessary in connection with the service provided, photograph (S),
- l) if necessary in connection with the service provided, health information (S),
- m) IP address associated with you.

For your information, we have marked sensitive personal data with the letter “(S)”. We only process sensitive personal data if it is necessary for the provision of the relevant service. For further details please refer to Article 9 of this document.

2.2 If you have not entered into a service contract with us, we only process your contact personal data, such as name and surname, address, e-mail address(es) and telephone number, if there is a legal ground for their processing.

3. What are the purposes of the processing, the legal ground for the processing, and the retention period of your personal data?

3.1 The processing of personal data always takes place only to the extent required by our service and in accordance with the purpose of processing. We process your personal data for the following purposes, on the legal grounds listed below and always only for as long as necessary.

3.2 If you use the service of our Website and fill in a request form, you provide your data to us by filling them in on the Website for the purpose of provision of such service to the extent specified in the request form.

- The legal ground for processing such data is the implementation of pre-contractual measures and the performance of the contract, as well as the legitimate interest of the Company. This personal data will be processed for the period strictly necessary for the given purpose and for the duration of the Company's legitimate interest.

3.3 If you choose to make use of the Company's offer to purchase our services, you provide us with data to the extent necessary to enter into a contract for such service and to provide such service. As a rule, it is the personal data specified in paragraph 2.1 of this document.

- The legal ground for the processing of the above data is the performance of the contract. This personal data will be processed for the duration of the contractual relationship and for the duration of the legal obligations that apply to us as a controller.

3.4 Due to the nature of the services we provide, we may also process your personal data in specific cases to protect your vital interests or those of another individual. Therefore, we process the data for the purpose of its use for arranging travel insurance and in case that at the time when we are providing the following services to you under the contract:

- a) there is an air accident or crash in which you are involved,
- b) you are injured or your health deteriorates, which requires professional help from a medical doctor/health care professional
- c) you will be involved in any accident, incident or natural disaster that damages (endangers) your life or health;
- d) you become missing in the course of being served by us.

In the above cases, we may process your personal data in such a way that we are able to transfer it to authorities investigating the air accident or crash, other accident, incident or natural disaster, or assisting you in connection with a threat to your life and health, or organizing a search for you.

The legal ground for processing this data in this case is to ensure the highest possible protection of your life and health, or your property (processing pursuant to Article 6(1)(d) of the GDPR). This personal data will be processed for the period necessary for the given purpose.

3.5 We may also process your personal data if you are interested in our customized services. In this case, we will need your personal data in order to enter you into our system, and your contact details so that we can contact you with a specific offer after compiling your holiday, or find out more information from you about your desired holiday. We would just like to point out that in this case we will consider you to be our customer, even if the holiday does not eventually take place. If when filling in the information, you also provide your consent to the processing of personal data, we will also process your data in accordance with this consent.

- The legal ground for processing such data is the implementation of pre-contractual measures and the performance of the contract, as well as the legitimate interest of the Company. This personal data will be processed for the period strictly necessary for the given purpose and for the duration of the Company's legitimate interest.

3.6 In addition to the above, we also need to process and store your personal data to the extent of name, surname, e-mail, telephone number, address, data specifying the service provided or goods sold and information regarding the agreed business opportunity in case of potential litigation or administrative proceedings in the future.

- The legal ground for such processing is the legitimate interest of the Company or a third party. This personal data will therefore be processed for the period necessary to fulfil this purpose, but no longer than twenty years from the triggering event for the limitation period in each particular case.

3.7 If you have given us your written consent to the processing of your personal data, we are entitled to process your personal data to the extent set out in this consent. If, as part of this consent, you have also given us your consent to use your personal data for marketing purposes, e.g. for the purpose of offering services and sending commercial communications pursuant to Act No. 480/2004 Coll., on certain information society services, we are entitled to process your personal data on the basis of such consent (if you give it) for marketing purposes of the tour operator, such as:

- sending offers from the tour operator and business partners of the tour operator to your voluntarily provided e-mail address,
 - including in the telephone database of the tour operator to offer services and tours of the tour operator and business partners of the tour operator if you provide us with your telephone number,
 - promoting the tour operator, sending commercial messages, and providing news and information.
- The legal ground for such processing is your consent. If you have given us your consent to process your personal data for marketing purposes only, we process your personal data for 5 years

from obtaining your consent or until you withdraw your consent to the processing or object to the processing.

3.8 For the sake of completeness, please note that if you have provided us with your e-mail address in connection with the provision of our services, we may, pursuant to Section 7(3) of Act No. 480/2004 Coll., on certain information society services, contact you by e-mail or telephone in order to offer our services, while you have the option to refuse such sending at any time (to opt-out). The details of your electronic contact for this purpose will be processed until you object to such processing. If the conditions set out in Section 7 of the aforementioned Act are not fulfilled for sending such offers, we will do so only if you give us your consent. If you have given us this consent, we process your personal data for the duration of the consent.

4. Who is the recipient of your personal data?

4.1 The recipient of your personal data is primarily our Company, i.e. the tour operator. With regard to the nature of the services provided by us to you under the contract, your personal data will also be provided by us; to the extent strictly necessary, to:

- a) transport providers (airline or other carrier),
- b) accommodation providers (hotel or other accommodation service provider),
- c) the insurance company with which the travel insurance will be taken out for you,
- d) providers of other services agreed in a contract with us,
- e) state and administrative authorities conducting investigations into an air accident or crash if such a case occurs,
- f) state and administrative authorities to protect your vital interests,
- g) medical facilities, doctors, paramedics or similar persons providing treatment to you and/or saving your life;
- h) legal representatives of us as the tour operator for the purpose of recovering debts and/or protecting our rights in the event of a breach of contract by you, and/or our defense against your claims;
- i) entities engaged in and/or charged with the recovery of debts,
- j) state and administrative authorities if we are requested to provide such data in connection with the exercise of the powers of such authorities,
- k) business partners for the purposes of marketing offers if you have given your consent to the processing of your personal data.

4.2 You may request a list of the tour operator's partners to whom your personal data has been provided at any time at the Company's registered office.

5. Will your personal data be transferred abroad?

5.1 With regard to the nature of the services we provide, your personal data may be transferred to other Member States of the European Union and to third countries (i.e. countries outside the European Union). In the event of transfers of personal data to third countries, we will act on the basis of a contract concluded with the recipient of the personal data, which will contain a standard contractual clause in the form required by the European Union law. We will only transfer personal data to the extent strictly necessary.

6. How long will the tour operator process your personal data?

6.1 The period of processing of your personal data varies according to the purpose of its processing and is described in Article 3 of this document. However, we generally process your personal data only for the period

necessary to provide the agreed tour operator service, for the period necessary to prove the provision of the service under accounting and tax regulations to the competent authorities of the Czech Republic, and for the period necessary to protect our rights in the event of your breach of contract, but in all cases always for no less than the period of limitation of any claims, whether yours or the tour operator's, arising from a concluded contract or in connection with a concluded contract. The length of the limitation period is specified in the Civil Code (Act No. 89/2012 Coll.).

6.2 Insofar as it concerns personal data in respect of which consent has been given by you for its processing (if such a case has occurred), such personal data will be processed, unless there is another legal ground for its processing, for the period for which your consent was given, but no longer than 5 years.

6.3 If you are interested in finding out for how long we process your personal data in a particular case, you may contact us at sales@exclusivetours.com.

7. How will your personal data be processed?

7.1 Your personal data will be processed in electronic form in the electronic system of the tour operator and, where applicable, in the electronic systems of the parties to which the personal data will be transferred. Your personal data will also be processed in the form of a tangible document (a document on paper or a similar tangible medium), which will be stored in the tour operator's filing system. Please be assured that we have put in place measures to ensure that your personal data is protected from misuse and loss at all times.

7.2 All persons on the part of our Company who come into contact with personal data have been trained and screened for the purpose. The archive of paper documents is secured against intrusion by unauthorized persons. The archive is secured by locks and other physical protection measures. Electronically processed personal data is stored in a secure database.

8. What are your rights in relation to the processing of personal data?

8.1 As a data subject, you have the right to request information at any time as to whether we process your personal data and, if so, you have the right of access to that personal data. However, you also have other rights in relation to the processing of personal data. If your personal data is inaccurate or incomplete, you have the right to have it rectified or completed. You have the right to request the erasure of your personal data, but this is only possible under certain conditions, e.g. if your personal data is no longer necessary for the given purpose or if you withdraw your consent and there is no other legal ground for the processing.

Under certain conditions, you may also request the restriction of the processing of your personal data, in particular if you contest the accuracy of the personal data or object to the processing.

You have the right to the portability of your personal data, but this is only possible for personal data that you have provided to us yourself and its processing is based either on your consent or on a contract concluded

between us. This must also be personal data processed by automatized means. If you exercise this right, it must not adversely affect the rights and freedoms of others, which the Company is obliged to assess at all times.

You also have the right not to be subject to a decision based solely on automatized processing, including profiling, if such decisions produce legal effects concerning you or similarly significantly affect you.

8.2 In the event of any doubt as to whether your personal data is being processed in accordance with applicable law, you always have the right to contact the Company.

8.3 Where you have given us your consent to the processing of your personal data, you have done so voluntarily and have the right to withdraw or restrict such consent at any time for each individual purpose. You may withdraw your consent by e-mail sent to the e-mail address sales@exclusivetours.com or by written notice of withdrawal of consent sent to the address of the Company's registered office.

If your personal data is processed for direct marketing purposes, including profiling, or on the basis of a legitimate interest of the Company, you also have the right to object to the processing concerned at any time.

You may exercise all these rights in the following ways:

- through a request sent by mail to the address of the registered office of the Company;
- through a request sent to the above e-mail address with your electronic signature; or
- through a request sent by a data box.

8.4 If anything is unclear, you may contact us at sales@exclusivetours.com or by phone: +420 739 808 000. You may also exercise your rights listed in this article of the document, in the manner specified therein. If we have not complied with your request or you are not satisfied with the information provided or with the handling of your request, you may file a complaint with the supervisory authority:

Office for Personal Data Protection
address: Pplk. Sochora 27, 170 00 Prague 7
Tel: +420 234 665 111
www.uoou.cz

9. How does the tour operator process your sensitive personal data?

9.1 Regarding sensitive personal data, we only process this data if it has been provided to us by you and/or if it has been disclosed by you, or if its processing is necessary to protect your vital interests or those of another natural person. We generally process the sensitive personal data listed in paragraph 2.1 above. In other cases, we only process sensitive personal data if you have given your consent to its processing. In this context, please note that in some countries sensitive personal data may be required to allow entry into such a country. Information about your health (weight, height, immobility) may be required for certain types of air transport. Information about your health is necessary for taking out travel insurance. Information about allergies and any medications you take is necessary when arranging food services. This means that we will not be able to provide you with the relevant service without being providing with such information. In situations where the above sensitive personal data is necessary for the provision of a service by us, this fact will be expressly brought to your attention at the

time of negotiating a contract with us, with the understanding that the relevant contract cannot be concluded unless you provide us with the said sensitive personal data.

10. Is providing your personal data a prerequisite for entering into a contract with the tour operator?

10.1 As we have stated in this document above, without being provided with your personal data, we cannot provide our services to you, with regard to the nature of the tour operator's activities and the type of services being agreed in the contract. This data is necessary for entering into a contract with us (identification of the parties to the contract, identification of the persons to whom the service is to be provided, provision of the service), and the contract cannot be concluded without such data being provided. In some cases, with regard to the service you have chosen, sensitive personal data may also be required by us for providing the service, as without such data it will not be possible for us to provide the service.

11. What is the processing of personal data?

11.1 Processing of personal data is any operation or set of operations which is performed on personal data or on sets of personal data, whether by mechanical means or by automated means. Processing involves the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

12. Further information

12.1 If we change the purpose of processing your personal data, we will inform you in advance. If your personal data is transferred to us from a third party, we will inform you. If anything in this information is unclear to you, we are ready to answer your questions. We may modify the information contained in this document as needed and to reflect the current situation. If applicable, we will notify you, as data subjects, of such change in due time. However, we recommend that you also regularly check the current version of this document on our Website at www.exclusivetours.com.

This information on the processing and protection of personal data by Exclusive Tours s.r.o. is effective from 1 April 2023.