

COMMUNICATION ON THE PROCESSING OF PERSONAL DATA

The purpose of this communication is to provide exhaustive information about the processing of personal data of natural persons who are the clients of ETN Slovakia, spol. s r.o., a travel agency (further „ETN“), in accordance with applicable legislation, mainly the Slovak Act 18/2018 on the protection of personal data which becomes effective on May 25, 2018.

Please read this information before providing your personal data to ETN or giving consent to the processing of personal data.

1. Information on the controller and processor:

The controller and processor in terms of personal data protection is the travel agency ETN Slovakia, spol. s r.o., established in Bratislava at Tupého 23/A, 831 01, reg. no.: 31 379 508, registered in the Business register of District Court I, Section Sro, file no. 7591/B conducting business in compliance with the legislation of the Slovak Republic and the EU.

Main business activity of the ETN travel agency:

Operation of licensed reservation systems, online and offline booking and sales of airline tickets, booking and sales of travel services (mainly accommodation, shuttle transfers, visa assistance, travel insurance)

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2. Supervisory authority

Personal Data Protection Office located in Bratislava at Hraničná 4826/12, 820 07

Phone no.: +421 2/323 132 14

Web page: <https://uoou.sk/>

3. Processing of client personal data by ETN

ETN processes the personal data of clients exclusively and to the extent necessary for the provision of the service required in accordance with section 1 of this communication, and such without which the service required could not be provided. In case of client request the client credit card data is also processed.

According to the law agreement to the processing of personal data for the purposes of the service required is understood to mean any solemn, freely given, specific, informed and unambiguous indication of the data subject's wishes by a statement or a clear affirmative action by which the natural person signifies agreement to the processing of his or her personal data.

Processing of personal data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available,

alignment or combination, restriction, erasure or destruction. The ETN travel agency processes and transmits personal data using automated means or, exceptionally, in paper form.

4. Sources of personal data of ETN clients

Personal data of clients is obtained directly from clients based on their voluntary provision (agreement), or from their authorized representatives, in order to provide the required travel service and in connection with the use of the provided travel service by the clients. ETN also obtains the client's personal data through its own activity, by processing previously provided personal data of clients, including for statistical purposes.

The ETN travel agency processes mainly the following personal data: name, surname, gender, e-mail, phone number, and in necessary cases also the date of birth, name and surname of parents (for visa purposes), travel document number, especially for the purposes of reserving, printing and delivery of the required air travel documents or any other required travel service. ETN is authorised to process personal data for this purpose electronically.

5. Legal basis for the processing of personal data

The legal basis for the processing of personal data is an order/contract and its acceptance for the purposes of reservation and provision of the required travel service, the consent of the client to the processing of his/her personal data for the purpose of provision of the required travel service and the legitimate interest of ETN to inform its clients about the agency's offer of travel services, and marketing purposes.

6. For the purposes of reserving and providing the required travel service the ETN travel agency may provide the obtained personal data to the following recipients:

- **GALILEO** airline reservations system whose data is located in the Travelport Data Centre in the U.S., and which implemented the template EU contract for the protection of personal data,
- **AMADEUS** ticket reservations system whose data is located in the Amadeus Data Processing Centre, Erding, Germany, data located in EU
- **Booking.com** accommodation reservations system, operated by Booking.com B.V. of Amsterdam, the Netherlands, to which EU personal data protection legislation applies directly, data located in EU
- **Diplomatic missions or consular posts** of third countries exclusively and to the extent necessary for the issuance of visa
- **Microsoft Slovakia, s.r.o.** for the purposes of cloud-based e-mail processing and other services, data located in EU
- **TULIP TOURS by Goglobal tours**, Nám. M. Benku 6, 811 07 Bratislava, reg. no.: 35797045, purpose - airline reservations system, data located in EU,
- **Generali poisťovňa, a.s. (Insurance Company)** European Travel Insurance Branch, of Bratislava, for the purpose of brokerage of travel insurance for clients, data located in EU
- **the tax administration**, to a limited extent, for the purpose of meeting the tax obligations of the ETN travel agency, data located in EU
- **the tax administration**, to a limited extent, for the purpose of meeting the obligations stemming from the Value Added Tax Law, data located in EU

- **FAX COPY CONSULT, spol. s r.o.**, accounting, audit, business and tax consulting company, located at Záhradnícka 34 Bratislava 2, reg. no. 31 351 948, for the purposes of bookkeeping of the ETN travel agency,
- **state and local authorities** for the purpose of defending the rights of the ETN travel agency in administrative, civil and criminal proceedings.

In order to ensure the provision of particular required travel services the ETN travel agency transmits personal data mainly to the following recipients:

- Airlines
- Accommodation service providers
- Travel insurance companies
- Embassies or consular posts of third countries
- Road and rail transport operators
- Car rental companies

Some recipients may be located or have an establishment outside of EU and outside third countries which ensure adequate protection of personal data, i.e. in third countries without an adequacy decision. The list of countries which ensure an adequate level of personal data protection is located at: <https://dataprotection.gov.sk/uouu/sk/content/prenos-do-krajinn-zarucujucich-primeranu-uroven-ochrany>. The ETN travel agency informs the clients that transmission of data to a third country where adequate protection of personal data is not ensured may still be necessary to reserve and provide the required travel service, following an explicit request/agreement of the client.

7. Personal Data Protection

The ETN travel agency adopted appropriate technical and organizational measures of personal data protection which are subject to regular updates and reviews. All personal data operations are performed using own automated means and systems which are protected by a security system. We implemented solutions to protect personal data including password protection, encryption, firewalls, anti-viruses, anomaly detection and access control for our employees including e-mail communication.:

LAN - protected by a firewall on a cisco router

Server - locked in a climate-controlled server room accessible only to authorized personnel; daily server back-up and replication; back-ups are encrypted

Local PCs - access by secured login and password; protected by regularly updated anti-virus software; no software approved by a directive may be installed; hard drive encryption

Bookkeeping/human resources management - data stored on a MSSQL server protected by login/password

Employees - informed that no data may be taken outside of company premises

Wifi - secured by wpa2 encryption

Mail server - communication between clients and the mail server is encrypted

Mobile phones - protected by a strong password

8. Personal data storage

The ETN travel agency stores personal data for a period of 5 years from the end of provision of the required service. Data retention for accounting purposes is governed by applicable legislation.

9. Consent withdrawal and objection to personal data processing

The client may withdraw his/her agreement to personal data processing at any time. The client may:

- request the deletion of his/her personal data processed by the ETN travel agency,
- access his/her personal data processed by the ETN travel agency,
- have his/her personal data processed by the ETN travel agency corrected,
- restrict the processing of his/her personal data by the ETN travel agency,
- object against the processing of his/her personal data by the ETN travel agency,
- require accuracy of his/her personal data processed by the ETN travel agency.

Withdrawal of consent by the client is mostly future-oriented and it does not affect the legality of personal data processing before the withdrawal. If the client withdraws consent or fails to provide it the situation may arise in which the ETN travel agency would not be able to reserve and provide certain travel services or would be compelled to modify them in an adequate manner.

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