PRIVACY POLICY

Updated on: 12.05.2020

Your privacy is very important to <u>pelikan.cz</u>. This Privacy Policy has been prepared to provide you with information about how we process your personal data when you interact with our Customer service experts, visit the <u>www.pelikan.cz</u> website from your computer or mobile device, or when your order different services from us.

"Personal data" shall denote data pertaining to a natural person whose identity is known or can be determined. If you wish to view a specific chapter of the Privacy Policy, please click one of the links below.

A. Categories of clients' personal data processed by Pelikan

1. PURPOSES AND LEGAL BASIS

Pelikan processes your e-mail address, phone number, name, surname, address for delivery of important information regarding the services and products you ordered, and any supporting communication in the pre-contract stage as well as after concluding a contract.

The legal basis for processing of your e-mail address and phone number for these purposes is the legitimate interest of Pelikan to provide you with important information regarding the services and products you ordered.

Pelikan processes your e-mail address so it can be assigned to your order when you communicate with our Customer support staff. The legal basis for such processing is our legitimate interest to provide high-quality support to our customers.

If you grant consent to receive marketing information and the information bulletin from Pelikan, Pelikan will process your e-mail address and phone number for purposes of sending marketing information and the information bulletin regarding different products and services offered at www.pelikan.cz. The legal basis for processing of your e-mail address for this purpose is your consent. You can withdraw your consent at any time using the unsubscribe link available at the end of our marketing e-mails, using the unsubscribe option at www.pelikan.cz or by contacting the Pelikan customer service at pobyty@pelikan.cz or letenky@pelikan.cz.

I. PERSONAL DATA PROCESSED IN COMMUNICATION WITH PELIKAN

When you communicate with representatives of our customer support via e-mail, online or in person, we gather personal data, such as your name, surname, address, phone number, e-mail address, Facebook ID, or date of birth. Such personal data can be received by WhatsApp, MessengerPeople, Apple Business Chat or Facebook, if the client uses the chat option available on our website www.pelikan.cz or at our Facebook page https://www.facebook.com/letenkypelikan.cz/. We can also create event protocols useful for diagnosing issues related to the use of our portal and record information about support or service related issues. In order to improve our customer service we can also record and review, in compliance with the law, conversations with our customer support and analyse the feedback provided by users in voluntary customer opinion surveys.

1. PURPOSE AND LEGAL BASIS

This information is used to provide customer and product support and to monitor the quality and types of customer and product support provided to our customers. The legal basis for the processing of such information for these purposes is the legitimate interest of Pelikan to provide you with quality customer support.

II. PERSONAL DATA PROCESSED WHEN CONCLUDING A CONTRACT WITH/THROUGH PELIKAN

1. COMMON PERSONAL DATA

If you order a service or a product using the www.pelikan.cz website, Pelikan will gather your information, such as your name, surname, gender, date of birth, e-mail address, postal address and phone number, for some services also your nationality, passport number, its date of expiry and the country where it was issued. We also process the following payment card information: payment card number (first six and last four digits), name and surname of the card holder, date of expiry and signature of the card holder. The recipient of such personal data is the company processing payments which meets the security criteria for processing payment card data. VÚB, a.s., as the third party payment gateway administrator, processes information about customers' payment cards when customers of Pelikan use their payment card to complete their purchase at www.pelikan.cz.

If you make a payment from your current account we process the name and surname of the account holder and the account number. If you make a direct deposit to our account we process the name and surname of the person making that deposit. Recipients of these data are the banks, the systems of which were used to make the payment.

Your name, surname, gender, date of birth, e-mail address, postal address and phone number, and for some services also your nationality, passport number, its date of expiry and the country where it was issued and your payment card data are processed so we can process your order. The legal basis for the processing of such data is the fulfilment of a contract or the execution of precontractual measures you requested. We also process your personal data as part of our fraud detection process. The legal basis for the processing of your personal data for this purpose is our legitimate interest to protect Pelikan and our customers from attempted fraudulent transactions.

In exceptional cases, personal data contained in your birth certificate can be processed, i.e. besides your name, surname, date of birth, place of birth, personal identification number and nationality, also the name, surname and

surname at birth of your father and mother, their date of birth, personal identification number and nationality. Also, in exceptional cases, the data contained in the birth certificate of your child/grand child can be processed, namely their name, surname, gender, date of birth, place of birth, personal identification number and nationality, and also the name, surname and surname at birth, date of birth, personal identification number and nationality of both his/her parents. Equally, all the data contained in your marriage certificate can be processed, i.e. besides your name, surname, surname at birth, date of birth, place of birth, personal identification number, nationality and marital status on the date of marriage, also the name, surname and surname at birth of the parents, and all data pertaining to your husband/wife and also the agreed male and female form of the surname of your children. The purpose in this case is to prove the relationship between you as a client and the person involved in the event that caused you to not be able to use the ordered service if you request a refund from the airline/travel agency. Typically, such an event is the death of a close person or their serious injury, hospitalisation, etc. The legal basis for the processing of these data is usually a contract concluded between you and the carrier/travel agency, which in such cases allows for a full/partial refund of the price of a flight ticket/tour. Another legal basis can be a contract with Pelikan who, as the intermediary in signing of a transportation contract or the travel agency in the case of a contract regarding the tour provision, attempts at your request to obtain a full/partial refund of the price of the flight ticket/tour from the carrier/travel agency.

2. SPECIAL CATEGORIES OF PERSONAL DATA

In exceptional cases we also process special categories of personal data, such as your health condition and biometric data contained in your travel documents.

Health information is processed in order to obtain an extraordinary refund from suppliers (airlines) for your unused mandatory service. We can also process health related information in order to request special transportation services, special assistance at the airport or during transport, e.g. requesting a special diet menu, transport of a wheelchair, a guide dog, etc.

Biometric data is processed to obtain a visa for our clients from the respective representative offices which are also the recipients of such personal data. The visa for some countries are procured by EVENT TOURISM, s. r. o. To send documents or their copies we use the services of Slovak Parcel Service, s. r. o.

The legal basis for processing of these special categories of personal data is the fulfilment of a contract. We pay special attention and caution to the processing of a special category of personal data.

III. PERSONAL DATA PROCESSED WHEN SETTING UP YOUR MY PELIKAN ACCOUNT 1. PURPOSES AND LEGAL BASIS

When you set up your My Pelikan account you must provide your e-mail address. Pelikan will process your e-mail address because you will use it

together with your password to log in to your account. The legal basis for processing of your e-mail address for this purpose is the legitimate interest of Pelikan to ensure protection of your account.

Pelikan is processing your e-mail address for the purposes of delivering important information regarding your products, applications or your My Pelikan account. The legal basis for the processing of your e-mail and name for these purposes is the legitimate interest of Pelikan to provide you with important safety information or other information regarding products, applications or your My Pelikan account.

Furthermore, by means of the My Pelikan account, which contains name and surname, sex, date of birth, telephone number, address of your residence, nationality, travel document number, expiry date and issuing country, it is much easier to create your orders of services at our portal. In your account, you can also have stored data related to persons, for whom you order services, if you have their consent for that – in that case, name and surname, sex, date of birth, nationality, travel document number, expiry date and issuing country are being processed. You will find these information not only through the My Pelikan account, but also through the app Pelipecky, which you will find in the Google Play and AppStore apps.

The legal basis of processing such personal data is to simplify the precontractual stage, i.e. the filling-in of the order and concluding of the contract.

IV. PERSONAL DATA PROCESSED WHEN PARTICIPATING IN COMPETITIONS ORGANISED BY PELIKAN

1. PURPOSES AND LEGAL BASIS

If you decide to participate in a competition organised by Pelikan, Pelikan can process your personal data, such as your name, surname, and e-mail address you provide. The purpose is to hold the competition and identify the contestant. The legal basis for the processing of such personal data is our legitimate interest in organising the competition.

Should you win in a competition, we can also request from you your permanent residential address, your date of birth and your phone number so we can deliver the prize.

We will retain your personal data for 4 years in order to protect our legitimate interest in case of a claim or similar proceedings. When you join a competition at www.pelikan.cz or through our Facebook profile https://www.facebook.com/letenkypelikan.cz/, we also request your consent to publish your name and the first letter of your surname should you win. If this consent is given, we will process this data for 1 year. Failure to give consent is not a reason for refusing a competitor to participate in the competition.

V. PERSONAL DATA PROCESSED IN CONNECTION WITH PRESS CONFERENCES AND PRESS RELEASES

1. PURPOSES AND LEGAL BASIS

If you take part in a press conference held by Pelikan, we process your name, surname, e-mail address and the name of your employer in order to keep track of all who are present. The legal basis for the processing of such personal data

is the legitimate interest of Pelikan to hold a press conference and process its output. Your data will be retained for a period of 1 year.

Should you wish to receive regular press releases, on the basis of your consent Pelikan will process your name, surname, e-mail address and the name of your employer (if any). Such consent will be valid for 2 years and you can withdraw it at any time completely or partially by sending a request to dpo@pelikan.sk.

VI. PERSONAL DATA PROCESSED AT PELIPECKY.CZ

Our portal pelipecky.cz provides information to our readers and potential customers of Pelikan regarding travel, holidays, destinations and other travel related news. The readers may react to specific articles, comment on them, ask questions, etc. In doing so they communicate with Pelikan employees. If you use this form of on-line communication, we gather your personal data, such as your name, surname and e-mail address.

1. PURPOSE AND LEGAL BASIS

This information is used to provide customer and product support and to monitor the quality and types of customer and product support provided to our customers. The legal basis for the processing of such information for this purpose is the legitimate interest of Pelikan to provide you with quality customer support.

B. LIST OF PROCESSED PERSONAL DATA FOR JOB SEEKERS AND SUCCESSFUL APPLICANTS

If you are interested in a job position at Pelikan or you have responded to one of the selection processes for any of the open positions, Pelikan will process your personal data contained e.g. in your CV, such as the academic title, name, surname, gender, date of birth, phone number, e-m ail address, permanent address, photographs, completed education, career and work experience (identification of your current and previous employers, professional orientation, awards, greatest work achievements, language and professional skills), hobbies and any other voluntarily provided details. Pelikan can check the accuracy and completeness of the data you provided with the entities you have specified.

1. PURPOSES AND LEGAL BASIS

The purpose of the processing of these personal data is the selection of future Pelikan employees. The legal basis is the legitimate interest of Pelikan to select the most suitable candidates for the open positions and the demonstration of your willingness to apply for a position at Pelikan. And because sometimes you do not succeed at the first attempt, Pelikan retains your personal data for 3 years so that we can contact you with a job offer should a position become open or a suitable new position become available.

If you succeeded in the selection process and decided to work for Pelikan either full time or using one of the employment methods specified in the Labour Code, besides the personal data specified above we will also process your other personal data in compliance with the labour management regulations, healthcare and social insurance regulations, tax regulations and similar. Such personal data can be in particular your personal identification number, your ID card number, your health insurance company, marital status, whether you have children and how many (in order to apply for a tax bonus), or whether your hold an ID proving your handicapped status. If you are to start employment with Pelikan, we are obliged to demand in accordance with the valid legal regulations that you take an introductory medical check-up to determine whether you are physically fit to work for us. We will also provide you with a regular medical check-up and process the lawful data provided by your doctor about your results. In this case, the legal basis is the applicable health and medical aptitude to carry out the work in question and the occupational health service legislation. Besides the said personal data, Pelikan also processes the contact information of your family member and his/her relationship with you who can be contacted in emergencies (occupational injury, unaccounted for absence, and similar).

Such personal data will be processed for the necessary period of time, however at least for the duration of your employment.

C. CATEGORIES OF PERSONAL DATA RECIPIENTS

Pelikan is a company that mediates services of companies from all over the world. In order to provide the services and products you ordered, we may have to transfer your personal data to other companies in other countries.

If you are our client, depending on the services you have ordered we will provide your personal data in particular to the suppliers with whom you or we have concluded a contract for the provision of service. Such recipients are in particular airlines providing transport of travellers, accommodation facilities, tour operators, travel agencies, insurance companies, car rental brokers and car rental companies, companies providing railroad, ship, bus or passenger transport, financial administration bodies, etc.

If you are our employee, your personal data will be provided to the health insurance company, the social insurance company, the financial administration bodies and other state administration bodies specified by the currently applicable legislation.

I. OTHER SERVICE PROVIDERS

Pelikan uses third party cloud services such as <u>Mandrill</u> or <u>Mailgun</u> which help with e-mail distribution. These companies monitor e-mail delivery to be able to tell whether the addressee opened them, whether they clicked the included links or whether they made a purchase based on such e-mail. Based on such data, Pelikan analyses the degree of interaction with the e-mails sent.

Pelikan uses the messenger service Slovak Parcel Service to send some purchased products (typically parking cards) to its customers.

D. COOKIES AND SIMILAR TECHNOLOGIES

I. WFBSITES

When you visit our website, third party analytical service providers help us gather certain information which help us to analyse how you and other visitors browse the www.pelikan.cz and www.pelipecky.cz websites and compile combined website utilisation and response statistics. Among the collected information are your IP address, the geographic location of your device, the browser type, the browser language, the date and time of your request, the times of your visits, what pages you viewed and what page items (e.g. links) you clicked. On our website and in our e-mail messages we use cookies, pixel tags, web beacons, transparent GIF files and other similar tools which help us gather and analyse the said information. We use such information to provide better and more relevant content at our website, to measure the efficiency of our advertising, to identify and fix issues, and to improve the overall user experience at our website. To provide on-line advertising we can use third party services of one or multiple service providers. They may use pixel tags or similar technologies, gather information about your visits to different websites, and use such information to send targeted advertising. For more information about such practices and how to refuse such gathering and use of data by a third party - our service providers - please visit Networkadvertising.org. If you do not wish to have your data collected using these technologies, most browsers offer a simple way to automatically disable them, or you can set up your browser to offer you the possibility to either accept or refuse the use of such technologies. If you reside within the European Union or another jurisdiction where we are obliged to request your consent to use cookies at our websites, you will be able to manage your preferences regarding cookies at the respective websites. However, some specific cookies are necessary to ensure the basic functionality of our website, that is why they cannot be disabled.

1. ANALYTICAL SERVICES

- Google: Google Analytics, DoubleClick, AdWords conversions, and Google Dynamic Retargeting are used to monitor and collect website statistics and demographic user categories, their interests and behaviour at websites, and collect information about the devices connecting to the given website. We also use the Google Search Console tool which helps us understand how visitors find our website and improve the optimisation of our search engine. Click here for more information about the ways in which such analytical data can be used, how you can control their use, and how you can revoke the consent to use your data provided to Google Analytics.
- Facebook AdReporting: Facebook AdReporting provides global anonymous data about adverts, how many people have viewed and clicked on the content, etc. Click here for more information about the ways in which such analytics data can be used, how you can control its use, and how you can revoke your consent to the use of your data by Facebook AdReporting.
- Facebook AudienceInsights: Facebook AudienceInsights provides basic anonymous demographic data about the people to whom a certain offer is displayed in the form of an advert. The smallest viewable sample is 1,000 people. Click here for more information about the

- ways in which such analytics data can be used, how you can control its use, and how you can revoke your consent to the use of your data by Facebook AudienceInsights.
- Exponea: Exponea is used to monitor location statistics, on-line orders and demographic user categories, their interests and behaviour at websites and collect information about the devices connecting to the given website. Click here for more information about the ways in which such analytics data can be used, how you can control its use, and how you can revoke your consent to the use of your data by Exponea.
- Freshmarketer: Freshmarketer is used to anonymously monitor user behaviour at websites and evaluate website changes and their impact on user behaviour. Click here for more information about the ways in which such analytics data can be used, how you can control its use, and how you can revoke your consent to the use of your data by Freshmarketer.
- Iperceptions: Iperceptions is used to anonymously collect website usability feedback. A few percent of website visitors are selected at random to anonymously answer a set of four questions. Their answers are stored anonymously. <u>Click here for more information</u> about the ways in which such analytics data can be used, how you can control its use, and how you can revoke your consent to the use of your data by Iperceptions.
- Optimizely: Optimizely is used to anonymously monitor user behaviour at websites and evaluate website changes and their impact on user behaviour. <u>Click here for more information</u> about the ways in which such analytics data can be used, how you can control its use, and how you can revoke your consent to the use of your data by Optimizely.
- Hotjar: Hotjar is used to anonymously monitor user behaviour at websites and evaluate website changes and their impact on user behaviour. <u>Click here for more information</u> about the ways in which such analytics data can be used, how you can control its use, and how you can revoke your consent to the use of your data by Hotjar.

2. RETARGETING SERVICES

- Facebook PIXEL: Our website uses <u>Facebook Pixel</u> retargeting technologies provided by Facebook. This allows us to display our advertising to visitors who in the past have shown interest in our products, using the advertising network of Pelikantravel.com, s.r.o.
- Sklik retargeting: Our website uses retargeting technologies <u>from Sklik retargeting</u> operated by Seznam.cz, a.s. This allows us to display our advertising to visitors who in the past have shown interest in our products, using the advertising network of Pelikantravel.com, s.r.o.
- RTB House: Our website uses retargeting technologies from RTB House operated by RTB House. This allows us to display our advertising to visitors who in the past have shown interest in our products, using the advertising network of Pelikantravel.com, s.r.o.
- eTarget: Our website uses retargeting technologies from <u>eTarget</u> operated by eTarget. This allows us to display our advertising to visitors who in the past have shown interest in our products, using the advertising network of Pelikantravel.com, s.r.o.

3. COOKIES

What kinds of cookies do we evaluate?

- Essential cookies allow us to use basic website features, such as registered user login or automatic filling-in of forms and remembering your preferences. If you disable these cookies we cannot guarantee the full functionality of our website.
- Operational cookies are used to record and analyse visitor behaviour on our website and subsequently to improve its functionality and appearance. If you disable these cookies we cannot guarantee the full functionality of our website.
- Advertising cookies serve to optimise the displayed content and advertising according to the visitor habits and the effectiveness of the marketing communication of the advertisers. Thanks to advertising cookies you will not be shown adverts you are not interested in.
- Third party cookies are created and used by service providers, such as Google Analytics, Google Adwords, Facebook, PAP, Exponet, Intercom, Optimizely and Zarget. These services are integrated with our website because we consider them useful and completely safe.

II. SOCIAL NETWORKS

Social networks as third parties providing interactive plugins and social network features (e.g. allowing to connect to Facebook or Google to look up friends or add links or to "Like" a website) at www.pelikan.cz and at Pelikan social network profiles can use cookies or other methods (e.g. web beacons) to gather information on how you use our websites and applications. How the third parties use such data depends on their privacy and data protection guidelines available at their respective websites, which you should read carefully. Such third parties can use cookies or other tracking methods for their own purposes and link information on how you use our websites with any other personal information they have gathered about you. We can also obtain analytical data from social networks which help us measure the efficiency of our social network contents and adverts (e.g. impressions and clicks).

E. CHILDREN UNDER 16 YEARS OF AGE

Because the services offered at our website can also be intended for individuals under 16 years of age, we process their data only to process the order, to correctly provide or book the ordered services and to provide customer service. The legal basis for the processing of personal data of such individuals is the fulfilment of a contract or execution of precontractual measures requested by our client.

We do not process the personal data of individuals under 16 years of age for purposes of direct marketing and promotion.

F. UPDATES TO THE PRIVACY POLICY

As we add new services and products, improve our current offering, and change technology and laws, we may change these privacy policies from time to time. The date of the most recent revision of the Privacy Policy can be found next to "Updated on" at the top of this page. All changes become effective as soon as the revised Privacy Policy is published.

G. PERSONAL DATA RETENTION

We will retain your personal data while your consent lasts, while there is a legitimate interest to retain them, or while we are obliged to do so by the applicable legislation. After the lapse of the required retention period, your personal data will be destroyed.

The "Your rights" section below describes your right to delete data.

H. DATA PROTECTION OFFICER

Our data protection officer is Mr Michal Marko, whom you can contact if you have any questions regarding data protection – dpo@pelikan.sk. If our response was not satisfactory and you believe that we process your personal data unlawfully, you can contact the Office for Personal Data Protection at https://www.uoou.cz/.

I. YOUR RIGHTS

In accordance with the General Data Protection Regulation, you have the right to request from Pelikan access to your data and also to exercise the following rights:

- find out whether or not Pelikan processes your personal data and, if so, what kind of data and for what purposes
- the right to rectification of personal data this allows you to correct any incomplete or inaccurate data we hold about you
- the right to erasure of personal data allows you to request that your personal data be erased, if there is no reason for us to continue processing them
- the right to data portability you can request that your data be provided to you in an electronic and structured form and transferred to another entity
- the right to restriction of processing of your personal data you can request that we suspend processing of your personal data for a certain period of time, e.g. if you want us to prove the accuracy of processing or the grounds for data processing
- the right to object against processing of your personal data you have the right to object where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or rights of the data subject which require protection of personal data, in particular where the data subject is a child. You can also object if personal data are processed for purposes of direct marketing, including an objection that you are subject to a decision based solely on the automated processing of personal data, including profiling
- the right to withdraw consent where we process your personal data on the basis of a previously granted consent, you have the right to withdraw such consent at any time and the right to lodge a complaint with a supervisory authority responsible for personal data protection (the Office for Personal Data Protection) which you can contact if you believe that your personal data is not being processed in compliance with the applicable legislation

If you require access to your personal data, their rectification or erasure, if you wish to exercise your right to restriction of processing or your right to object against processing of your personal data, please fill-in the following <u>form</u>.