

# Principles and rules for personal data protection

Updated on: 11.5.2020

Your privacy is very important for Flipo. We have elaborated these rules for personal data protection in order to inform you about processing of your personal data when you communicate with our experts within the Customer service, when you visit the portal [www.flipo.at](http://www.flipo.at) from a computer or from your mobile device or when you create an order for various services.

”Personal data“ are information related to a physical entity, identity of which is known, or can be found out. If you want to skip to some specific part of the principles and rules for personal data protection, click to the individual link below:

## A. Categories of personal data of clients processed Flipo

### 1. PURPOSE AND LEGAL BASIS

Flipo processes your email address, telephone number, name, surname, address also for purposes of delivery of important information related to services/products you have ordered, support communication in pre-contractual phase and also after contract conclusion.

A legal basis for processing of your email address and telephone number for these purposes is a legitimate interest of Flipo in providing you with important information related to services/products you have ordered.

Flipo processes your email address so that it can be assigned to your order, when you communicate with representatives of our customer support. A legal basis for this processing is our legitimate interest in providing you with a qualitative customer support.

If you give your consent with delivery of marketing information and newsletter from Flipo, Flipo will process your email address also for purposes of sending marketing information and newsletters about various products/services offered within the portal [www.flipo.at](http://www.flipo.at). A legal basis for processing of your email address for this purpose is your consent. You can cancel your consent anytime by means of a link for termination of delivery in the bottom part of our marketing emails, by means of termination directly at the portal [www.flipo.at](http://www.flipo.at) or by contacting Flipo customer service at the address [info@flipo.at](mailto:info@flipo.at).

### I. PERSONAL DATA PROCESSED AFTER COMMUNICATION WITH FLIPO

When you communicate with the representatives of our customer support by email, phone, online or personally, we collect personal data such as your name, surname, address, telephone number, email address. We can also create event logs, which are useful for diagnosis of problems related to using of our portal; we can also record

information about a problem related to support or service. In order to improve the customer services and within the applicable laws, we can also record and monitor communications with the customer support, and to analyse the feedback provided the users through volunteer surveys of customer thoughts.

#### *1. PURPOSE AND LEGAL BASIS*

We use this information for the purposes of customer and product support and for monitoring of quality and types and customer and product support we provide to our customers. A legal basis for processing of such information for these purposes is a legitimate interest of Flipo in providing you with qualitative customer support.

### *II. PERSONAL DATA PROCESSED IN CASE OF CONCLUSION OF CONTRACT WITH/BY MEANS OF FLIPO*

#### *1. ORDINARY PERSONAL DATA*

If you order a service/product through the web portal [www.flipo.at](http://www.flipo.at), Flipo collects your name, surname, sex, date of birth, email address, postal address and telephone number, in case of some services also nationality, passport number, date of its expiration, country that issued this passport. Data from your credit card we process are: credit card number, (the first six and the last four digits of your credit card), name and surname of card holder, date of card expiration and signature of card holder. This information is received also by the company that secures payments and that meets safety standards for processing of credit card data. The company VÚB a.s., as an administrator of the payment wall in the position of the third party, processes information about credit card of a customer when Flipo customers use credit card for completion of a purchase at the portal [www.flipo.at](http://www.flipo.at).

If you pay by bank transfer from a payment account, we process the account holder's name and surname and account number. If you pay a direct deposit to our bank account, we process the name and surname of the person who made the direct deposit. The recipients of these data are the banks through which the payment is processed.

We process your name, surname, sex, date of birth, email address, postal address and telephone number, in case of some services also nationality, passport number, date of its expiration, country that issued this passport and data of your credit card in order to process your order. A legal basis for processing of this data is performance of a contract or performance of pre-contract measures based upon your application. We process your personal data also within our processes for revealing of frauds. A legal basis for processing of your personal data for this purpose is our legitimate interest in protection of Flipo and of our customers against efforts for fraudulent transactions.

In exceptional cases, personal data contained in your birth certificate can be processed, i.e. besides your name, surname, sex, date of birth, place of birth, personal identification number, and state citizenship, also the name, surname and surname at birth of your father and mother, their date of birth, personal

identification number and state citizenship. Also, in exceptional cases, the data contained in the birth certificate of your child/grand child can be processed, namely their name, surname, sex, date of birth, place of birth, personal identification number, and state citizenship, and also the name, surname and surname at birth, date of birth, personal identification number and state citizenship 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, state citizenship, 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 demonstrate proximity of blood between you as a client and the person to which pertains the event that has caused your inability to use the ordered service and your request of a refund from an airline or a travel agency. Typically, such event is the death of a close person or their serious injury, hospitalisation, etc. The legal basis for processing of these data is usually a contract concluded between your and a 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 Pelican, who, as the intermediary in signing of a transportation contract or the travel agency in case of 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 CATEGORY OF PERSONAL DATA**

Exceptionally, we process also a special category of personal data, which is represented by information about your health condition and biometric data contained in your travel documents.

Information about health condition is processed in order to acquire an extraordinary refunding from suppliers (airline companies) for ordered services you did not utilize. 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, assistance dog, etc.

We process information about biometric data in order to provide visas for our clients at the corresponding embassies that are receivers of this personal data. The company EVENT TOURISM s.r.o. helps us with provision of visas to some countries. We send documents, or their copies, by the courier company Slovak Parcel Service, s.r.o.

A legal basis for processing of special category of personal data is performance of a contract. Increased attention is paid to processing of special categories of personal data.

## **III. Personal data processed when creating the account Mein Flipo (My Flipo)**

### **1. PURPOSE AND LEGAL BASIS**

When you create Mein Flipo account, we ask you to provide us with your email address. Flipo processes your email address, because you use it, together with your password, to log in to your account. A legal basis for processing of your email address for this purpose is a legitimate interest of Flipo in protection of safety of your account.

Flipo processes your email address also for the purpose of delivery of important information about our products, applications or about the Mein Flipo account. A legal basis for processing of your email address and name for this purpose is a legitimate interest of Flipo in providing you with important information about safety or other information about our products, applications or about the Mein Flipo account.

Furthermore, by means of the Mein Flipo 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 Mein Flipo account, but also through the app Flipohits, which you will find in the Google Play and AppStore apps.

A legal basis for processing of this personal data is a simpler process of the pre-contract phase, i.e. filling in of your order and conclusion of a contract.

#### IV. PERSONAL DATA PROCESSED IN CASE OF PARTICIPATION IN PRESS CONFERENCES AND SENDING OF NEWS RELEASES

##### 1. PURPOSES AND LEGAL BASIS

If you attend a press conference organized by organization Flipo, we will process your name, surname, e-mail address and eventually your employer as well in order to record the presence of attendees. The legal basis for the processing of this personal data is the Flipo's legitimate interest, namely arranging a press conference and processing its outcomes. We will keep your personal data for one year.

If you are interested in receiving regular news releases, Flipo will for that purpose on the basis of your consent process your name, surname, e-mail address and eventually your employer as well. The consent is granted for a period of 2 years and you can withdraw it at any time in part or in full by sending the request to e-mail address [dpo@pelikan.sk](mailto:dpo@pelikan.sk).

#### B. LIST OF PROCESSED PERSONAL DATA OF APPLICANTS FOR JOB IN FLIPO AND OF SELECTED SUCCESSFUL APPLICANTS

If you are interested in working for Flipo, whether based upon your own initiative, or based upon publicized selection procedure for one vacant jobs, Flipo processes your personal data,

which contains for example your curriculum vitae within the scope of your academic degree, name, surname, sex, date of birth, telephone contact, email address, residence address, photograph, data of achieved education, data related to carrier and working experience (identification of current and previous employers, professional focus, awards, greatest working successes, language abilities and professional skills), hobbies as voluntarily entered data. Flipo can verify truthfulness of your data through subjects you entered in your application.

## 1. PURPOSES AND LEGAL BASIS

The purpose for processing of this personal data is a selection of future Flipo employees. A legal basis is a legitimate interest of Flipo in selecting the most suitable candidates for the job positions and expression of your will to apply for job in Flipo. Because sometimes you don't succeed at first try, Flipo retains your personal data for 3 years so we can contact you with a job offer should a position become open or a suitable new position become available.

If you were successful in a selection procedure, and if you agreed with Flipo upon a job position, whether as a permanent employment relationship, or in the form of one type of agreements according to the Labour Code, except for above specified personal data, we will process your other personal data on the basis of labour-legal regulations, regulations related to health insurance and social welfare, tax regulations, etc. Such personal data could be represented by your birth certificate number, number of your ID card, health insurance company, family status, if you have any children and their number (in case of application for tax bonus), if you are a holder of ZTP card. If you are to work for us, we are obliged to ask you, on the basis of applicable legislation, to undergo an incoming medical check, result of which will be a declaration whether you are capable to perform assigned labour duties. We will also provide you with regular medical checks, and we will process data required by law about results of such check that will be issued by a doctor. In this case, a legal basis is a corresponding legislative related to health and to capability of employees to perform corresponding job and to medical service.

In addition to the above-mentioned personal data, Flipo processes contact to the family member as well and his / her relationship with the employee in order to contact him / her in case of extraordinary circumstances (e.g. work injury, unjustified absence at work, etc.) The given personal data will be processed during the necessary period, at least a duration of the employment relationship.

## C. Categories of personal data recipients

Flipo is the company that mediates services of companies from all over the world. In order to provide you with services/products you have ordered, it may be necessary to transfer your personal data to other companies in other countries.

If you are a client, based upon services you have ordered we provide your personal data mainly to the suppliers, with which you or we have concluded a contract within performance of ordered services. These recipients are mainly airline companies that provide transportation of people, accommodation facilities, travel agencies and offices, insurance companies, car rental companies, embassies, consulates, operators providing rail, ship, bus or passenger transportation, financial administration bodies.

If you are an employee, your personal data will be provided to health insurance company, Social insurance agency, financial administration bodies and to other corresponding bodies of state administration according to applicable legislative.

#### I. Other providers of services

Flipo uses cloud services of the third parties, such as [Mandrill](#), [Mailgun](#), which help us with sending emails. These services monitor activities related to these emails, for example if they are opened by an addressee, if he/she clicked to links in emails and if he/she makes a purchase after clicking the links. On the basis of this data, Flipo analyses the interaction rate of emails it is sending.

Flipo uses the courier company Slovak Parcel Service for delivery of purchased products (mainly of parking cards) to the customers.

#### II. Other information made available

We can make your personal data available to the third parties: (a) if we have your valid consent for such activity; (b) within performance resulting from the applicable legislative, e.g. valid summons, judicial order, legal proceeding or from other legal obligation; (c) within enforcing our contractual conditions or rules; or (d) if necessary within application of available legal corrective measures or defence in case of legal claims. Furthermore, we can send your personal data to the affined subject, subsidiary company or to the third party in case of any reorganisation, fusion, sale, partnership of joint venture type, acquisition or transfer of the whole company, property or proprietary share of Flipo, or its part, or in case of some other handling with the company inter alia, without limitation, related to bankruptcy or similar activities, under condition that the subject your personal data is provided to will not be entitled to process them in other way than described in these rules for personal data protection. We will be entitled to do so without a need to inform you, and in case corresponding acts require so, also without your consent.

### D. Cookie files and similar technologies

#### I. Web localities

With help of providers of analytical services in a position of the third parties, during your visit of our locality, we collect certain information that helps us to analyse how you and other visitors browse the web locality [www.flipo.at](http://www.flipo.at), and to compile combined statistics about using of the web locality and about the response rate. This information are represented by IP address, geographic location of the device, type of browser, browser language, date and time of your request, times of your visits, display of pages and page elements (e.g. links) that you click on. In or webs or in sent emails,



we can use cookie files, pixel marks, web signalisation, transparent GIF files or other similar tools, which help us to collect and analyse specified information. We use this information for providing better and more relevant content at our locality, for measurement of effectiveness of our ads, for identification and repair of problems and for improvement of overall impression of our locality. In order to provide online advertisement on our behalf we can use also services of the third party – one or more providers of services. They can use pixel marks or similar technologies in order to collect information about your visits at the localities, and they can use such information for sending of aimed advertisement. You can find more information about such practices and about method how to refuse this collecting and using of data by the third party – our service providers – at the locality [Networkadvertising.org](http://Networkadvertising.org). if you do not wish your personal data are collected by means of these technologies, in majority of web browsers, there is a simple procedure how to automatically refuse many of these technologies, or your web browser can offer you a possibility to choose whether you want to accept or to refuse them. If you are a resident of the European Union, or of some other jurisdiction, in which we are obliged to ask for your consent to use the cookie files at our webs, you will be able to manage your preferences related to the cookie files at the corresponding webs. But some specific cookie files are necessary for basic functioning of the webs, and, therefore, you cannot ban these cookie files.

#### 1. ANALYTICAL SERVICES

- Google: Services Google Analytics, DoubleClick, AdWords conversions, Google Dynamic Retargeting are used for monitoring of statistics about the locality and of demographic categories of users, their interests and behaviour at web localities and information about devices, by which they connect to the specific web locality. We also use Google Search Console tool for support in understanding how the visitors find our web pages and for improvement of optimization of our search engine. Obtain more information about how these analytical tools can be used, how you can regulate their using and how you can cancel your consent with using of your personal data by means of Google Analytics.
- Facebook AdReporting: Facebook AdReporting tool provides global anonymous data about ad spots, how many people have seen specific content, how many people have clicked on it, etc. Obtain more information about how these analytical tools can be used, how you can regulate their using and how you can cancel your consent with using of your personal data by means of Facebook AdReporting.
- Facebook AudienceInsights: Facebook AudienceInsights tool provides basic anonymous demographic data about people, to which we advertise specific offer. The smallest displayable sample is 1000 people. Obtain more information about how these analytical tools can be used, how you can regulate their using and how you can cancel your consent with using of your personal data by means of Facebook AudienceInsights.
- Exponea: Exponea tool is used for monitoring of statistics about locality, online orders and demographic categories of users, their interests and behaviour at web localities and information about devices, by which they connect to the specific web locality. Obtain more information about how these analytical tools can be used, how

you can regulate their using and how you can cancel your consent with using of your personal data by means of Exponea.

- Freshmarketer: Freshmarketer tool is used for monitoring of anonymous behaviour of users at web localities and for evaluation of changes made at the web locality and their impact upon behaviour of users. Obtain more information about how these analytical tools can be used, how you can regulate their using and how you can cancel your consent with using of your personal data by means of Freshmarketer.
- Iperceptions: Iperceptions toll is used for anonymous collection of feedback related to web usability. Certain percentage of web users is randomly selected to anonymously answer to four questions. Their replies are then anonymously stored. Obtain more information about how these analytical tools can be used, how you can regulate their using and how you can cancel your consent with using of your personal data by means of Iperceptions.
- Optimizely: Optimizely tool is used for monitoring of anonymous behaviour of users at web localities and for evaluation of changes made at the web locality and their impact upon behaviour of users. Obtain more information about how these analytical tools can be used, how you can regulate their using and how you can cancel your consent with using of your personal data by means of Optimizely.
- Hotjar: Hotjar tool is used for monitoring of anonymous behaviour of users at web localities and for evaluation of changes made at the web locality and their impact upon behaviour of users. Obtain more information about how these analytical tools can be used, how you can regulate their using and how you can cancel your consent with using of your personal data by means of Hotjar.

## 2. RETARGETING SERVICES

- Facebook PIXEL: Our web pages use retargeting technologies from [Facebook Pixel](#) service operated by Facebook company. This technology enables us to show ad within the ad network of pelicantravel.com, s.r.o. company to users, who already showed interest in our products.
- Sklik retargeting: Our web pages use retargeting technologies from [Sklik retargeting](#) service operated by Seznam.cz, a.s. company. This technology enables us to show ad within the ad network of pelicantravel.com, s.r.o. company to users, who already showed interest in our products.
- RTB House: Our web pages use retargeting technologies from [RTB House](#) service operated by RTB House company. This technology enables us to show ad within the ad network of pelicantravel.com, s.r.o. company to users, who already showed interest in our products.
- eTarget: Our website uses [eTarget](#) retargeting technology provided by eTarget. This allows us to display advertising to visitors who, in the past, have shown interest in our products, using the advertising network of pelicantravel.com, s.r.o.

## 3. COOKIES

What cookies do we evaluate?



- Basic cookies files, these cookies allow you to use basic features such as logging in a registered user or pre-filling of forms and remembering your preferences. If you disable these cookies, we cannot guarantee the full functionality of our site.
- The business cookies files, these cookies serve to capture and analyze a visitor's behavior on a website, and consequently to improve its functionality and appearance. If you disable these cookies, we can not guarantee the full functionality of our site.
- Ad cookies files serve to optimize the displayed content and ads based on visitor's habits and the effectiveness of advertiser's marketing communications. For example, thanks to them you will often not be able to see futile ads from an area you are not interested in.
- Third-party cookies are created and used by service providers such as Google Analytics, Google Adwords, Facebook, PAP, Exponea, Intercom, Optimizely, Zarget. These services are integrated into our website because we consider them useful and fully secure.

## II. SOCIAL NETWORKS

Social networks in a position of the third parties, which provide interactive plug-in modules and social network functions (e.g. it enables you to connect to Facebook or Google in order to search friends or they add interconnections such as “Like” for a page) at the web localities of [www.flipo.at](http://www.flipo.at) and Flipo profiles at social networks, can use cookie files or other methods (e.g. web signals) for collecting of information about how you use our web localities and applications. Using of such data by the third party depends upon rules for personal data protection available at the web page of the corresponding social network that you should thoroughly study. These third parties can use cookie files or other monitoring methods for own purposes and connect information about how you use our pages with any personal data they collect about you. We can also obtain analytical information from the social networks, which help us to measure effectiveness of our content and ads at the social networks (e.g. impressions and clicks).

### E. Children younger than 16 years of age

As the services offered by means of our portal can be dedicated also to persons younger than 16 years of age, we process data of these persons only for the purpose of order processing, administration facilitation and booking of ordered services and providing of the customer service. A legal basis for processing of data of these persons is performance of the agreement or performance of the pre-agreement measures on the basis of client's request.

For the purpose of the direct marketing and promotion of services, we do not process personal data of persons younger than 16 years of age at all.

### F. Updating of rules for personal data protection

With regard to adding new services or products, to improvement of our current offer and to changes of technologies and law, we can change these rules for personal data protection from time to time. You can find the date of the last revision of these rules for personal data protection under “Updated” at the top of this page. All changes come into force at the moment of publicizing of revised rules for personal data protection.

## G. Keeping of personal data

We will keep your personal data until granting of your consent is valid, until we have a reasonable reason to keep them or until the applicable legislation binds us to do so. After expiration of defined retention period for keeping of personal data, your personal data will be destroyed.

Below, in “Your rights” part, your right to deletion of your personal data is described.

## H. Data protection officer

The person responsible for the protection of your personal data is Mr. Michal Marko, who can be contacted by e-mail at – [dpo@pelikan.sk](mailto:dpo@pelikan.sk). If you are not satisfied with our answer, and if you think we process your personal data incorrectly, please contact the supervisory authority – Personal Data Protection Agency – at the web page <https://www.dsb.gv.at/>.

## I. Your rights

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

- find out whether or not Flipo 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's no reason for us to continue processing them
- the right to data portability - you can request that your data be provided to you in 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 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 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
- the right to lodge a complaint with a supervisory authority - the supervisory authority responsible for personal data protection is 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 would like to request access to your personal data and exercise the above rights (in addition to the right to file a complaint with the Office for Personal Data Protection), please send an email to [dpo@pelikan.sk](mailto:dpo@pelikan.sk).