Privacy Policy and Personal Data Protection Principles for the <u>pelican.travel</u> Portal

Updated: 19.06.2025

Privacy Policy and Personal Data Protection Principles for the pelican.travel Portal	1
1. Introduction	.1
2. Data Controller	2
3. Purposes for Which We Process Your Personal Data	.2
3.1 Personal Data Processed During Communication with Pelikán	.2
3.2 Personal Data Processed When Participating in Competitions Organized by Pelikán	
3.2.1 Purpose: Execution of the competition and identification of the participants and the winner	
3.2.2 Purpose: Announcement of the Competition Winner	3
3.3 Personal Data Processed on the pelican.travel Portal	4
3.3.1 Purpose: Processing of Readers' Personal Data on the pelican.travel Porta 4	al.
3.3.2 Purpose: Bug Reporting	4
3.4 Personal Data Processed for Marketing Communication	.4
3.4.1 Purpose: Sending Marketing Information and Newsletters	5
3.4.2 Purpose: Client Communication via Social Media	.5
3.4.3 Purpose: Campaigns via Facebook and Google Audience	5
3.5 Personal Data Processed When Handling GDPR Requests	6
4. Cookies, Pixels and Their Use	6
5. Data Transfers to Third Countries	9
6. Children Under the Age of 16	.9
7. Updates to the Privacy Policy	.9
8. Retention of Personal Data	9
9. Contact Information	9
10. Your Rights1	0

1. Introduction

These Personal Data Protection Principles and Rules of pelicantravel.com s.r.o. (hereinafter referred to as "Pelikán") have been prepared in accordance with Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "EU Regulation").

Your privacy is very important to Pelikán, and when visiting our website <u>pelican.travel</u> or using our services, we want you to feel safe. That is why we have created these Personal

Data Protection Principles, where you can learn how we collect and process your personal data when you visit the <u>pelican.travel</u> portal from your computer or mobile device, as well as about your rights concerning the protection of personal data.

The full rules, including additional purposes of personal data processing by Pelikán, can be found here (hyperlink the word "here" to principles according to the specific market).

2. Data Controller

The data controller for the processing of your personal data is:

pelicantravel.com s.r.o.

Registered office: Pribinova 17954/10, 811 09 Bratislava, Slovak Republic Business Register: Registered in with the Commercial Register of the District Court Bratislava III, Section: Sro, Insert No.: 32895/B Company ID (IČO): 35 897 821

(hereinafter also referred to as "Pelikán")

If you have any questions regarding the processing of your personal data or the exercise of your rights, please contact us via email at **dpo@pelikan.sk** or in writing at the address of our company our company's registered address.

3. Purposes for Which We Process Your Personal Data

"**Personal data**" means refers to information relating to a natural person who is identified or identifiable.

If you would like wish to skip to a specific part of the Personal Data Protection Principles and Rules, click on the relevant link below:

3.1 Personal Data Processed During Communication with Pelikán

Purpose: Provision of customer and product support, and monitoring the quality and types of such support.

Categories of personal data: Standard personal data

Description of the category and recipients: When communicating with our customer support representatives via email, telephone, online chat, or in person, we collect personal data such as your first name, last name, address, phone number, email address, Facebook ID, and date of birth. Recipients of some of this personal data may include, for example META and Apple if the client uses the chat feature on the website <u>www.pelikan.sk/en</u> or the Facebook page <u>https://www.facebook.com/Pelikan.sk/</u>.

We may also create event logs that are useful for diagnosing issues related to the use of our portal record information about the support or service-related problems. To improve our customer services, and within the limits of applicable legislation, we may also record and review conversations with customer support representatives and analyze feedback provided through voluntary customer satisfaction surveys.

Pelikán may communicate with you using communication applications, for example, those provided by Meta. We recommend that you thoroughly familiarize yourself with the terms of service and the data processing policies of the application provider.

When communicating with our customers, we may use advanced technological solutions based on artificial intelligence (AI), such as our Voicebot, which helps us provide fast and efficient customer support. Before communicating with the Voicebot, customers are transparently informed that the interaction will be conducted with AI, and they are given the option to choose an alternative form of communication. Recipients of your personal data may therefore include providers of general-purpose artificial intelligence modules.

Legal basis: The legal basis for processing this information is Pelikán's legitimate interest in providing you with quality customer support, as well as compliance with a legal obligation in the event of data disposal.

Retention period: 6 years from the date the request was processed.

3.2 Personal Data Processed When Participating in Competitions Organized by Pelikán

3.2.1 Purpose: Execution of the competition and identification of the participants and the winner

Categories of personal data: Standard personal data

Description of the category and recipients: Pelikán may process your personal data such as your first name, last name, and email address that you provide when entering the competition. If you become a winner, your residential address, date of birth, and telephone number may also be processed for the purposes of prize handling and delivery. Recipients may include providers of cloud services, such as Bloomreach, Meta (Facebook), and Alphabet Inc. (Google).

Legal basis: The legal basis is the legitimate interest—organizing the competition and successfully evaluating its results. The legal basis also includes compliance with a legal obligation regarding data disposal.

Retention period: 4 years from the end of the competition.

3.2.2 Purpose: Announcement of the Competition Winner

Categories of personal data: Standard personal data

Description of category and recipients: Pelikán may process your name and the initial of your surname, which may be published on our Pelikán website and <u>pelican.travel</u> platform, as well as on social networks such as Facebook. The recipients include companies operating social networks, such as Meta (Facebook).

Legal basis: The legal basis is the winner's consent. Refusal to provide consent does not disqualify the participant from entering the competition. The legal basis also includes compliance with legal obligations regarding data disposal.

Retention period: 1 year after the end of the competition.

3.3 Personal Data Processed on the pelican.travel Portal

3.3.1 Purpose: Processing of Readers' Personal Data on the pelican.travel Portal

Categories of personal data: Standard personal data

Description of category and recipients: The pelican.travel portal provides travel information to readers and potential clients of Flipo. Readers may comment on articles, ask follow-up questions, and participate in discussions. During such interactions, we process your personal data such as first name, last name, and email address, which you provide when submitting a comment or inquiry.

Communication with readers is handled by Pelikán employees, and the data may be processed through content management and customer support systems.

Legal basis: The legal basis for processing this information for these purposes is Pelikán's legitimate interest in providing quality customer support. The legal basis also includes compliance with legal obligations in the event of data disposal.

Retention period: 4 years from the date of the last communication.

3.3.2 Purpose: Bug Reporting

Categories of personal data: Regular personal data

Description of category and recipients: When recording and processing bugs in the <u>pelican.travel</u> application, we process the email address. This informationis necessary to identify the individual reporting the bug and to ensure effective communication during the resolution process Recipients may include providers of cloud platform and development tools (e.g., project, version, and code management tools such as JIRA, GitHub). Users may report bugs through various communication channels operated by the controller. Recipients include Alphabet Inc., Daktela s.r.o., Mango Technologies, Inc., and technical support providers.

Legal basis: The legal basis for processing this information is Pelikán's legitimate interest in ensuring the proper technical operation of the application and system support, detecting and resolving errors, monitoring functionality, and fulfilling with legal obligations in the event of data disposal.

Retention period: 2 years from the date the bug was reported.

3.4 Personal Data Processed for Marketing Communication

3.4.1 Purpose: Sending Marketing Information and Newsletters

Categories of personal data: Standard personal data

Description of category and recipients: Pelikan processes your email address and phone number for the purpose of sending marketing information and newsletters about various products/services offered through the <u>pelican.travel</u> platform.

Pelikan uses third-party cloud services, such as Mailgun, to assist with the distribution of emails. These services track activity related to these emails, such as whether the recipient opened them, clicked on any links, and whether a purchase was made after clicking. Flipo analyzes this interaction data to assess engagement with the emails it sends. The recipients of the personal data are the companies providing these cloud services.

Legal basis: The legal basis for processing your email address for this purpose is your consent to receive information as a client about current prices, discounts, promotions, travel tips, news, and special offers. You can unsubscribe from the newsletter at any time via the link included in every email. The legal basis also includes compliance with legal obligations in the event of data disposal.

Retention period: If you have given consent to receive newsletters, we will process your email address for this purpose for 6 years from the date of consent or until you withdraw your consent and unsubscribe. If the newsletter is sent based on our legitimate interest, your email address will be processed for this purpose for 1 year from your last purchase, or only until you object to such processing or unsubscribe yourself.

3.4.2 Purpose: Client Communication via Social Media

Categories of personal data: Regular personal data

Description of category and recipients: If you choose to communicate with Pelikan via social media, we may process your name, surname, photo, email address, phone number, profile contacts, and ID. The recipients of this data are the companies operating the social networks, such as META (Facebook).

Legal basis: The legal basis for processing your personal data during communication on Facebook is either a contract or our legitimate interest. The legal basis also includes compliance with legal obligations in the event of data disposal.

Retention period: We process your personal data and communication on Facebook until you object to such processing or the post is deleted, or as long as it remains relevant to us, which may vary depending on its archival value.

3.4.3 Purpose: Campaigns via Facebook and Google Audience

Categories of personal data: Regular personal data

Description of category and recipients: For campaigns conducted via Facebook and Google, we process personal data such as first name, surname, and email address. This

data is required to create targeted audience segments for marketing campaigns. The recipients of such data may include companies operating social networks and providers of cloud services, such as Bloomreach, Meta (Facebook), and Alphabet Inc. (Google).

Legal basis: The legal basis is the legitimate interest of the data controller in marketing communication and the promotion of its services (targeting and evaluation). In the case of data disposal, the legal basis is the controller's legal obligation.

Retention period: 50 months from the creation of the record

3.5 Personal Data Processed When Handling GDPR Requests

Purpose: Processing requests related to personal data protection

Categories of personal data: Regular personal data

Description of category and recipients: When handling GDPR-related requests, we process personal data such as first name, surname, email address, and other information related to the request. This data is necessary to identify the requester and to properly process their request concerning personal data protection. The recipients of this data may include legal service providers specializing in data protection.

Legal basis: The legal basis is the fulfillment of legal obligations arising from the GDPR regulation and the Personal Data Protection Act. The legal basis also includes compliance with legal obligations in the event of data disposal.

Retention period: 5 years from the processing of the request

4. Cookies, Pixels and Their Use

Cookies are small text files stored in your browser or mobile device while browsing websites. Pixels are small images or "snippets of code" found on a website or in an email that collect information about your browser or mobile device. Some of them may also store cookies. Some cookies and pixels are set by us, others come from third parties.

We use various types of cookies on our websites:

- **Operational cookies**: These are necessary for the proper functioning of our websites.
- Analytical cookies: These help us understand how visitors use our websites.
- Marketing cookies: These are used to display relevant advertisements and offers.

1. Operational cookies

These cookies ensure the proper functioning of our website — for example, allowing you to log in to your user account, save items in your shopping cart, or protect against unauthorized access. Their use is essential; therefore, we do not require your consent to store them.

Google Analytics 4

Purpose: Measuring website traffic and analyzing user behavior. **Controller**: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland More about privacy can be found <u>here</u>.

Bloomreach

Purpose: —

Controller: Bloomreach Inc., 82 Pioneer Way, Mountain View, CA 94041, USA More about privacy can be found <u>here</u>.

Cloudflare

Purpose: Protecting the website from attacks (e.g., DDoS), speeding up page loading, and security solutions.

Controller: Cloudflare, Inc., 101 Townsend St, San Francisco, CA 94107, USA More about privacy can be found <u>here</u>.

Vimeo

Purpose: Ensuring proper playback of videos embedded on the website. **Controller**: Vimeo Inc., 330 West 34th Street, New York, NY 10001, USA More about privacy can be found <u>here</u>.

Crisp Chat

Purpose: Enables online chat with customer support and stores the communication history. **Controller**: Crisp IM SARL, 2 Boulevard de Launay, 44100 Nantes, France More about privacy can be found <u>here</u>.

2. Analytical cookies

These cookies allow us to collect anonymized statistical data about how you use our website. They help us better understand your behavior online, monitor traffic, identify the most popular content, and analyze site performance. Thanks to this information we can continuously improve user experience and tailor our services to your needs. We require your consent to store these cookies, which you may revoke at any time in your settings.

Microsoft Clarity

Purpose: We use Microsoft Clarity on our website to analyze user behavior. This tool helps us understand how visitors interact with our site by:

- Heatmaps (visualizations of user interactions with the page)
- Recording anonymized user sessions to improve the user experience
 Controller: Microsoft Corporation, Redmond, WA, 91-1144445 USA
 More information on privacy in Microsoft Clarity can be found in the <u>Microsoft Clarity</u> <u>Privacy Policy</u>.

3. Marketing and Advertising Cookies

These cookies allow us to display personalized ads and content based on your preferences. We use them only with your consent.

Google Ads

Purpose: Google Ads uses cookies to display personalized ads based on your previous interactions with our website or other websites. These cookies also allow us to track the effectiveness of our ads.

Controller: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland More about privacy can be found <u>here</u>.

Facebook Ads

Purpose: Facebook Ads uses cookies to deliver personalized advertisements and measure their effectiveness. These cookies track your interactions with our website and allow us to target ads based on your interests.

Controller: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

More about privacy can be found here.

PushAlert

Purpose: PushAlert uses cookies to send push notifications to your browser or device. These cookies allow us to personalize notifications and track their delivery and interaction. **Controller**: PushAlert, 202-B, Galaxy Bazaar, Opp. Sunrise Park, Vastrapur, Ahmedabad,

India

More about privacy can be found here.

Reddit Pixel

Purpose: Reddit Pixel is a tool that allows us to track user interactions with our website after viewing or interacting with our ads on Reddit. This data helps us optimize and improve our ad campaigns. Reddit Pixel uses cookies to store information on your device. These cookies may be first-party (set by our website) or third-party (set by Reddit). For more information on Reddit's use of cookies, see <u>their Cookie Notice</u>.

Controller: Reddit, Inc., 548 Market St. #16093, San Francisco, CA 94104, USA More about privacy: See <u>Reddit's Privacy Policy</u> for details on how they process personal data.

TikTok Pixel

Purpose: TikTok Pixel is a tool that allows us to track user interactions with our website after viewing or interacting with our ads on TikTok. This data helps us optimize and improve our advertising campaigns. TikTok Pixel uses cookies to store information on your device. These cookies may be first-party (set by our website) or third-party (set by TikTok). For more information on TikTok's use of cookies, see <u>their Cookie Policy</u>.

Controller: TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland More about privacy: For details on how TikTok processes personal data, see <u>their Privacy</u> <u>Policy</u>.

Your Choices

You can manage your consent to the use of marketing cookies through:

- **Browser settings**: You can delete or reject cookies, but some website features may not function properly.
- Third-party tools: You can limit cookies using tools like optout.aboutads.info.
- **Partners**: Each partner provides cookie management options in their settings (see links above).

For more detailed information about the specific cookies we use, please refer to our cookie settings available on our website.

5. Data Transfers to Third Countries

Your personal data may also be processed outside the European Economic Area (EEA). In such cases, we ensure an adequate level of data protection through Standard Contractual Clauses approved by the European Commission or other appropriate safeguards in accordance with the GDPR.

6. Children Under the Age of 16

The <u>pelican.travel</u> portal does not offer services to individuals under the age of 16 and therefore does not process their personal data.

7. Updates to the Privacy Policy

As we add new services and products, improve our current offerings, and adapt to technological and legal changes, we may update this Privacy Policy from time to time. The date of the last revision of this Privacy Policy can be found under the "Updated" label at the top of this page. All changes take effect upon publication of the revised Privacy Policy.

8. Retention of Personal Data

We will retain your personal data for as long as your consent remains valid, we have a legitimate interest in retaining the data, or we are legally obligated to do so by applicable legislation. Once the specified retention period has expired, your personal data will be destroyed.

Your right to data erasure is described below in the section "Your Rights."

9. Contact Information

If you have any further questions regarding the processing of your data, the exercise of your rights, or if you wish to contact our Data Protection Officer, you can reach us in person at the following address:

pelicantravel.com s.r.o. (Controller) Pribinova 17954/10 811 09 Bratislava Slovak Republic

Or via email at **dpo@pelikan.sk**, or by completing the provided form.

If you are not satisfied with our response and believe that we are processing your personal data incorrectly, please contact the supervisory authority:

Office for Personal Data Protection via their website: https://dataprotection.gov.sk/uoou/

10. Your Rights

Under the General Data Protection Regulation (GDPR), you have the right to request access to your personal data from Pelikan, and to exercise the following rights:

- **Right to access** You have the right to find out whether Pelikan is processing your personal data, and if so, what personal data we hold and the purpose for its processing.
- **Right to rectification** This allows you to correct any incomplete or inaccurate information we hold about you.
- **Right to erasure (right to be forgotten)** You may request the deletion of your personal data when there is no longer a legal basis for us to continue processing it.
- **Right to data portability** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit the data to another controller.
- **Right to restrict processing** You can request that we temporarily restrict the processing of your personal data, for example, if you want us to verify its accuracy or the reason for its processing.
- Right to object to processing You have the right to object when your personal data is processed on the basis of legitimate interests pursued by the controller or a third party, if your interests or fundamental rights and freedoms override those interests, especially if the data subject is a child. You may also object to the processing of your personal data for direct marketing purposes, including being subject to decisions based solely on automated processing, including profiling.
- **Right to withdraw consent** If your data is being processed based on your consent, you have the right to withdraw that consent at any time.
- **Right to lodge a complaint with a supervisory authority** The supervisory authority for personal data protection is the Office for Personal Data Protection, which you may contact if you believe your personal data is not being processed in

accordance with applicable legislation.

If you wish to request access to your personal data and exercise the above rights (except for lodging a complaint with the supervisory authority), please fill in and submit the appropriate <u>form.</u>