

# RULES AND REGULATIONS ON THE PROTECTION OF PERSONAL DATA

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Your privacy is very important to Flipo. We have developed these Rules on protection of personal data in order to provide you with information on the ways we process your personal data when you contact our specialists from the customer service, when you visit [www.flipo.pl](http://www.flipo.pl) use a computer or a mobile device and order various services from us.

“Personal data” mean the information concerning a natural person whose identity is known or who can be identified. If you want to move on to a particular part of the rules and regulations on the protection of personal data, please click the link below:

## A. CATEGORIES OF CUSTOMERS' PERSONAL DATA PROCESSED BY FLIPO

### 1. PURPOSE AND LEGAL BASIS

Flipo processes your e-mail address, telephone number, first and last name, address also for the purposes of providing important information concerning the services/products you ordered and supporting contact in the pre-agreement phase and after the agreement has been concluded.

The legal basis for the processing of your e-mail address and telephone number for these purposes is Flipo's legitimate interest in providing you with important information on the services/products you have ordered.

Flipo also processes your e-mail address in order to assign it to the order when you contact our customer service representatives. The legal basis for such processing is our legitimate interest in providing you with the highest quality customer service.

If you consent to receive marketing information and a newsletter from Flipo, Flipo will process your e-mail and telephone contact data in order to send marketing information and the newsletter concerning various products/services offered through the [www.flipo.pl](http://www.flipo.pl) portal. The legal basis for the processing of your e-mail address for this purpose is your consent. You may revoke your consent at any time through the cancellation link at the bottom of our marketing e-mails, unsubscribing directly at [www.flipo.pl](http://www.flipo.pl) or contacting the Flipo customer service at [info@flipo.pl](mailto:info@flipo.pl).

### I. PERSONAL DATA PROCESSED WHEN CONTACTING FLIPO

When you contact representatives of our customer service by e-mail, phone, on-line or in person, we collect such personal data as first and last name, address, telephone number, e-mail address and Facebook ID. The recipients of some of these personal data may be [WhatsApp](#), [MessengerPeople](#), [Apple Business Chat](#) or [Facebook](#), if the customer is using the chat at [www.flipo.pl](http://www.flipo.pl) or Facebook <https://pl-pl.facebook.com/Flipopl/>.

We may also create event logs, which are useful when diagnosing problems related to the use of our portal and record information about the problem with technical support or service. In order to improve customer service within the applicable law, we also may record and verify conversations with customer service representatives and analyse feedback which the users will provide us with by means of voluntary customer opinion surveys.

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

We use this information to provide the customers with product support and to monitor the quality and type of support for the client and product which we provide our customers with. The legal basis for the processing of this information for this purpose is Flipo's legitimate interest in providing the customers with good support.

### *II. PERSONAL DATA PROCESSED WHEN ENTERING INTO AGREEMENTS THROUGH FLIPO*

#### *1. ORDINARY PERSONAL DATA*

If you order a service/product through [www.flipo.pl](http://www.flipo.pl), Flipo will collect your first and last name, gender, date of birth, e-mail address, postal address and telephone number, and in the case of certain services, also the nationality, travel document number, date of its expiry and the country which issued it. The data from your payment card which we process: payment card number (first six and last four digits of the payment card), first and last name of the card owner, card's expiry date and signature of the card owner. The recipient of these personal data will also be a company acting as a payment intermediary which meets the security standards for the processing of payment cards data. VÚB a.s. as a payment gateway administrator in the position of a third party processes information on the customer's payment card when Flipo customers use the card to complete the purchase at [www.flipo.pl](http://www.flipo.pl).

If the payment is made by money transfer, the processed data are: the first and last name of the account holder and the account number. In the case of cash payments, the first and last name of the person requesting the payment is processed on the account. The recipients of these data are banks whose systems intermediate in the transaction.

We process your first and last name, gender, date of birth, e-mail address, postal address and telephone number and in the case of certain services, also the nationality, travel document number, expiration date, country of issue, as well as the data from your payment card in order to process your order. The legal basis for the processing of these data is to execute the agreement or conduct pre-agreement actions upon your request. We also process your personal data as part of our fraud detection processes. The legal basis for processing your personal data for this purpose is our legitimate interest in protecting Flipo and our customers against attempted fraudulent transactions.

In exceptional cases the data processed may include the personal data from your birth certificate, i.e. apart from the first and last name, gender, date of birth, place of birth, PESEL [Personal ID] number, citizenship, also the first

name, last name and family name of the father and mother, their dates of birth, PESEL numbers and citizenship. Furthermore, in exceptional cases the data processed may include the personal data from the birth certificate of your child/grandchild, i.e. first and last name, gender, the child's date of birth, place of birth, PESEL [Personal ID] number, citizenship, as well as the first name, last name and family name, date of birth, PESEL number and citizenship of both his or her parents. In addition, the data processed may include the personal data from your marriage certificate, i.e. apart from the first and last name, family name, date of birth, place of birth, PESEL [Personal ID] number, citizenship, marital status at the moment of entering into marriage, first name, last name and family name of the parents, all the data concerning your spouse, as well as the female and male form of the agreed last name of the children. In this case the purpose of processing the data is to document the family relationship between you as the customer and the person affected by the event which caused the inability to use the ordered services in the event of a reimbursement from the airline/travel agency. Such an event is usually the death of a close relative or his or her serious accident, hospitalisation, etc. The legal basis for the processing of these personal data is usually the agreement concluded between you and the carrier/travel agency, which in such cases enables a full/partial reimbursement of the flight ticket/trip. Furthermore, the legal basis can be the agreement with Flipo which, as an intermediary participating in the conclusion of the transport agreement/travel agency in the case of concluding an agreement for the organisation of a trip, attempts to obtain upon your request and by way of exception, a partial/full reimbursement of the flight ticket/ trip from the carrier/travel agency.

## 2. SPECIAL CATEGORY OF PERSONAL DATA

By way of an exception, we also process a special category of personal data which includes information concerning your health and biometric data included in the travel documents.

Information concerning health is processed in order to obtain an extraordinary refund from the providers (airlines) for applicable, commissioned services which have not been used. Furthermore, we may process information concerning health should you require special services for transport, special assistance at the airport or during transport, e.g. if you request a dietary meal, transport of a wheelchair, guide dog, etc.

Information on biometric data is processed for the customers in order to obtain visas from the relevant embassies that are the recipients of these personal data. We are assisted in the process of obtaining visas for some countries by EVENT TOURISM s.r.o. Documents or their copies are sent through the courier company Slovak Parcel Service s.r.o.

The legal basis for the processing of the special category of personal data is the execution of the agreement. We pay increased attention and care to the processing of a special category of personal data.

## III. PERSONAL DATA PROCESSED WHEN CREATING THE MY FLIPO ACCOUNT

#### 1. PURPOSE AND LEGAL BASIS

When opening a My Flipo account, we ask you to provide us with your e-mail address. Flipo processes your e-mail address because you use it together with your password to log into your account. The legal basis for the processing of your e-mail address for this purpose is Flipo's legitimate interest in the scope of the protection of your account's security.

Flipo also processes your e-mail address in order to provide you with important information concerning your products, apps or the My Flipo account. The legal basis for the processing of your e-mail address and last name for these purposes is Flipo's legitimate interest in providing you with important information concerning security or other information about your products, apps or the My Flipo account.

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

The legal basis for the processing of these personal data is the simpler course of pre-agreement phase, i.e. completing your order and concluding the agreement.

### IV. PERSONAL DATA PROCESSED WHEN PARTICIPATING IN COMPETITIONS ORGANISED BY FLIPO

#### 1. PURPOSE AND LEGAL BASIS

If you take part in a competition organised by Flipo, Flipo may process your personal data, such as your first and last name and the e-mail address you provide when entering the competition. The purpose is to conduct the competition and identify the participant. The legal basis for the processing of these personal data is our legitimate interests, i.e. the organisation of the competition.

If you turn out to be the competition winner, the following data may be further processed for the purposes of processing and delivering your prize: residential address, date of birth, telephone contact.

We will store your data for 4 years for the purpose of protecting our legitimate interests in case of a complaint proceeding or other. After entering the competition and you win, we will ask you for consent to publish your first name and the first letter of your last name at [www.flipo.pl](http://www.flipo.pl) and on our Facebook profile [https://www.facebook.com/Flipopl/?ref=br\\_rs](https://www.facebook.com/Flipopl/?ref=br_rs). If you provide us with this consent, we will process these data for 1 year. Failure to provide consent is not a reason to refuse participation in the competition.

## V. PERSONAL DATA PROCESSED WHEN PARTICIPATING IN PRESS CONFERENCES AND SENDING OUT PRESS RELEASES

### 1. PURPOSE AND LEGAL BASIS

If you participate in a press conference organised by Flipo, we process your first and last name, e-mail address and, possibly, information concerning your employer to record attendance. The legal basis for the processing of these personal data is Flipo's legitimate interest, i.e. the organisation of the press conference and the processing of its results. We will store your personal data for the period of 1 year.

If you are interested in receiving regular press releases, upon your consent Flipo will be processing your first and last name, e-mail address and, possibly, also the data of your employer for this purpose. The consent is given for the period of 2 years and you may revoke it at any time, in part or in full, by sending a request to [dpo@pelikan.sk](mailto:dpo@pelikan.sk).

## VI. PERSONAL DATA PROCESSED AT THE FLIPOHITY.PL PORTAL

The purpose of the flipohity.pl portal is to inform readers and potential customers of Flipo about travels, holidays, destinations and other tourist attractions. The reader has the opportunity to react to a particular article and comment on it, ask additional questions, etc. There is also a possibility to communicate with Flipo's employees. Personal information such as your first name, last name and email address is collected during this online communication.

### 1. PURPOSE AND LEGAL BASIS

This information is used for the purpose of providing customer and product support and to monitor the quality and different kinds of customer and product support that we provide to our customers. The legal basis for the processing of such information for this purpose is Flipo's legitimate interest in ensuring high quality customer service.

## B. SUMMARY OF PROCESSED PERSONAL DATA OF PEOPLE SEEKING EMPLOYMENT AT FLIPO AND EMPLOYEES

If you are interested in working for Flipo, upon your own initiative or on the basis of an open competition for one of the open positions, Flipo will process your personal data including, e.g. your Curriculum Vitae, in the scope of your academic title, first and last name, gender, date of birth, telephone contact, e-mail address, place of residence, photograph, data concerning your education, data concerning your career and professional experience (identification of the current and previous employer, professional orientation, awards, greatest professional achievements, linguistic skills and professional competencies), hobby and optional voluntary data. The correctness and completeness of the data you provide may be verified with the entities you have mentioned.

## 1. PURPOSES AND LEGAL BASIS

The purpose for the processing of these personal data is the selection of Flipo's future employees. The legal basis is Flipo's legitimate interest in the selection of the most suitable candidates for the work positions and the expression of your willingness to apply for employment at Flipo. Since not everything works out the first time, Flipo stores your personal data for a further 3 years in order to contact you and offer you employment, should there be a vacancy or a new position which would be suitable for you.

If you have successfully completed the selection process and agreed with Flipo on your professional cooperation, be it in a permanent employment relationship or on the basis of one of the agreements compliant with the Labour Code, other than the personal data mentioned above we will also process your other personal data, pursuant to the legal and labour regulations, health insurance and social security regulations, tax regulations, etc. Such personal data may include in particular your PESEL [Personal ID] number, identity card number, the health insurance institution where you are insured, family relationship, whether you have children and how many (in the event of a tax rebate) and whether you are the holder of a pensioner card. If you are to commence employment at our company pursuant to the applicable law, we will then ask you to undergo a preliminary medical check-up in order to determine if you are able to work for us. We will also regularly schedule medical check-ups as part of occupational medicine and we will process certain data concerning their results that will be given to you by your doctor. The legal basis in this case is the relevant applicable law concerning health and competencies of employees to do certain work, and the occupational medicine. In addition to the above personal data, Flipo also processes a family member's contact data and their relationship with the employee for contacting in the event of extraordinary situations (e.g. injury at work, unjustified absence from work, etc.). The above personal data will be processed throughout the necessary period, at least for the time of the employment relationship.

## C. CATEGORIES OF PERSONAL DATA RECIPIENTS

Flipo is a company that acts as an intermediary of corporate services from around the world. In order to deliver the services/products you have ordered, we may need to provide your personal data to other companies in other countries.

If you are a customer, depending on the services ordered, we provide your personal data mainly to the suppliers with whom you have entered into an agreement as part of the provision of the services ordered. These recipients are mainly carriers providing air transport, accommodation, travel agencies, tourist agencies, insurance companies, car rental intermediary companies and car rental companies, embassies, consulates, carriers providing rail, water, bus or personal transport and tax authorities.

If you are an employee, your personal data will be provided to the health insurance institution, social security institution, tax authorities and other relevant public administration authorities, in accordance with applicable law.



## I. OTHER SERVICE PROVIDERS

Flipo uses third party cloud services, such as [Mandrill](#) and [Mailgun](#), which help Flipo send e-mails. These services monitor actions related to these e-mails, e.g. whether the recipient has opened them, clicked the link in the e-mail message or made a purchase by clicking them. On the basis of these data, Flipo analyses the level of interaction with the e-mails.

Flipo uses the services of the courier company Slovak Parcel Service to send the customers the products they have purchased (e.g. parking cards).

## D. Cookie files and similar technologies

### I. WEBSITES

With the help of analytic services providers in the position of a third party, when you visit our website we collect certain information which helps us analyse how you navigate on the [www.flipo.pl](http://www.flipo.pl) website and compile the combined statistics regarding the use of the website and the extent of the response. This information includes: IP address, geographical location of the device, browser type, browser language, date and time of your request, time of your visit, website views and elements (e.g. links) that you click on. The information on our website or e-mail may use cookie files, pixel tags, network signalling, transparent GIF files or other tools that helps us collect and analyse the information you provide. We use this information to improve our website and create more relevant content, to measure the effectiveness of our advertisements, to identify and solve problems, as well as to improve the general experience on our website. In order to present on-line advertisements on our behalf, we may use the services of a third party - one or more service providers. They can use pixel tags or similar technologies in order to collect information on your visits to websites and use this information to send out customised advertisements. For more information about such practices and how to refuse such collection and use of data by a third party - our service providers - see [Networkadvertising.org](http://Networkadvertising.org). If you do not wish your data to be collected with the use of these technologies, the majority of browsers include a simple procedure enabling you to automatically reject many of these technologies. The browser may also offer you a choice to reject them or consent to their use. If you reside permanently in the European Union or a country of a different legal system which imposes the obligation to obtain your consent to use cookie files on our websites, you will have the option to manage your choices regarding cookie files on particular websites. However, certain cookie files are necessary for the basic functioning of websites, so these cookie files cannot be rejected.

#### 1. ANALYTICAL SERVICES

- Google: The Google Analytics, DoubleClick, AdWords conversions, Google Dynamic Retargeting services are used to track statistics concerning location and demographic profile of the users, their interests and behaviour on websites, as well as the information on devices they use to access a given website. We also use the Google Search Console tool to help us understand how the visitors found our website and to improve the optimisation of our search engine. [More information](#) about how these analytical data can be used, how their use

can be regulated and how you can revoke your consent to the use of your data by the Google Analytics service.

- Facebook AdReporting: The Facebook AdReporting service offers anonymous data on advertising videos, how many people saw a given post, clicked on it, etc. at a global level. [More information](#) on the way these analytical data can be used, how you can regulate their use and how you can revoke your consent to your data being used by the Facebook AdReporting service.
- Facebook AudienceInsights: The Facebook AudienceInsights offers basic anonymous demographic data on persons the offer is directed to. The smallest available sample is 1,000 people. [More information](#) on the way these analytical data can be used, how their use can be regulated and how you can revoke your consent to the use of your data by the AudienceInsights service.
- The Exponea service: The Exponea service is used to track statistics concerning location, on-line orders and demographic profiles of users, their interests and behaviour on websites, as well as the information on devices they use to access a given website. [More information](#) on the way these analytical data can be used, how their use can be regulated and how you can revoke your consent to the use of your data by the Exponea service.
- The Freshmarketer service: The Freshmarketer service is used to track the anonymous behaviour of users on websites and the assessment of changes made on websites and their impact on the user's behaviour. [More information](#) on the way these analytical data can be used, how their use can be regulated and how you can revoke your consent to the use of your data by the Freshmarketer service.
- The Iperceptions service: The Iperceptions service is used to collect anonymous feedback concerning the website usability. Several percent of random visitors to the website are selected for an anonymous survey consisting of four questions. Their answers are then anonymously recorded. [More information](#) on the way these analytical data can be used, how their use can be regulated and how you can revoke your consent to the use of your data by the Iperceptions service.
- The Optimizely service: The Optimizely service is used to track anonymous behaviour of users on websites and the assessment of changes made on websites and their impact on the user's behaviour. [More information](#) on the way these analytical data can be used, how their use can be regulated and how you can revoke your consent to the use of your data by the Optimizely service.
- The Hotjar service: The Hotjar service is used to track the anonymous behaviour of users on websites and the assessment of changes made on websites and their impact on the user's behaviour. [More information](#) on the way these analytical data can be used, how their use can be regulated and how you can revoke your consent to the use of your data by the Hotjar service.

## 2. RETARGETING SERVICES



- Facebook PIXEL service: Our websites use retargeting technologies through the [Facebook Pixel](#) service operated by Facebook. It enables us to show our advertisements in the Flipo advertising network to visitors who have already expressed an interest in our products.
- The Sklik retargeting service: Our websites use retargeting technology through the [Sklik retargeting](#) service operated by Facebook. It enables us to show our advertisements in the Flipo advertising network to visitors who have already expressed an interest in our products.
- The RTB House service: Our websites use retargeting technology from the [Facebook Pixel](#) service operated by RTB House. It enables us to show our advertisements in the Flipo advertising network to visitors who have already expressed an interest in our products.
- eTarget: Our websites use [eTarget](#) retargeting technology operated by eTarget. It enables us to show our advertisements in the pelicantravel.com s.r.o. advertising network to visitors who have already expressed an interest in our products.

### 3. COOKIES

What kind of cookie files do we analyse?

- Basic cookie files enable the use of basic functions such as logging in of a registered user or earlier filling in of forms and remembering your preferences. If you block these cookie files we will not be able to guarantee the full functionality of our websites.
- Operational cookie files serve to record and analyse the behaviour of visitors to the website and to improve the website's functionality and appearance. If these cookie files are blocked we will not be able to guarantee the full functionality of our websites.
- Advertising cookie files serve to optimise the viewed content and advertisements in terms of the visitor's habits and the effectiveness of a sponsors' marketing communication. Thanks to them, for example, you will not see advertisements from industries that you are not interested in very often.
- Third party cookie files are created and used by providers of such services as Google Analytics, Google Adwords, Facebook, PAP, Exponea, Intercom, Optimizely and Zarget. These services are integrated with our websites because we consider them useful and fully secure.

## II. SOCIAL MEDIA WEBSITES

Social media sites acting as third parties which offer interactive plug-ins or the functions of social media sites (e.g. enable connecting to the Facebook or Google service in order to look for friends or add links, e.g. the "I like it" sign for websites) on [www.flipo.pl](http://www.flipo.pl) websites and Flipo profiles on social media sites can use cookie files

or other methods (e.g. network signals) for collecting information on your use of our websites and apps. The use of such data by a third party depends on the personal data protection rules available on the website of a given social media site, which should be thoroughly read and understood. Such third parties may use cookie files or other tracking methods for their own use and combine the information of your use of our websites with any other separate information they have collected about you. Social media sites may also provide us with analytical information which help us measure the effectiveness of our website's content and the advertisements on social media sites (e.g. views and clicks).

## E. CHILDREN UNDER THE AGE OF 16

Because the services provided through our website may also be directed at persons younger than 16, we only process the personal data of such persons for the purposes of order processing, correct brokering and booking of the ordered services and conducting customer service. The legal basis for the processing of data of such persons is to execute the agreement or undertake pre-agreement safeguards upon the customer's request.

The personal data of persons younger than 16 are not processed for the purposes of direct marketing and promotion of services at all.

## F. UPDATES OF PERSONAL DATA PROTECTION RULES

In connection with the addition of new services and products, improvement of our previous offer and changes to technology and legal acts, we may constantly change these personal data protection rules. You can find the date of the last change of these personal data protection rules under the "Updates" tab at the top of this page. All changes shall become effective at the moment the amended personal data protection rules are published.

## G. STORING PERSONAL DATA

We will store your personal data until the expiry of your consent, as long as we have a legitimate interest in storing them or until the applicable law requires us to do so. After the lapse of the set period for the storing of your personal data, your personal data will be deleted.

Your right to delete your data has been set out below, in the "Your rights" section.

## H. THE PERSON RESPONSIBLE FOR THE PROTECTION OF DATA

The person responsible for the protection of personal data is Mr Michal Marko, who you may contact at [dpo@pelikan.sk](mailto:dpo@pelikan.sk). If you are not satisfied with our reply and you suspect that we process your personal data in an improper way, please contact the supervision authority, the Personal Data Protection Office, through <https://www.giudo.gov.pl/>.

## I. YOUR RIGHTS

According to the regulation on personal data protection, you have the right to demand access to your personal data from Flipo and exercise the following rights:

- the right to obtain information as to whether Flipo processes your personal data and, if so, what data it is and the reason for processing it;
- the right to correct personal data – you have the right to verify any type of incomplete or inaccurate personal data present in our systems;
- the right to delete personal data – you have the right to request that your personal data are deleted if there is no reason for the further processing thereof
- the right to transfer data – you have the right to transfer your personal data in an electronic, structured form from Flipo to another entity
- the right to limit the processing of your personal data – you have the right to apply for a temporary suspension of the processing of your personal data if, for example, you request that the accuracy of the processing or the reason thereof is documented;
- the right to object to the processing of personal data – you have the right to object to the processing of personal data if the processing is necessary in view of the legitimate interest of the controller or a third party, provided that the interests or rights of a person whom the data requiring protection concern outweigh the former interests, especially if the person whom the data concern is a child. You also have the right to object if personal data are processed for direct marketing purposes, including the fact that it relates to your decision based solely on automated processing of personal data, including profiling;
- the right to withdraw consent – if your personal data are processed pursuant to your consent, you have the right to withdraw it at any time;
- the right to lodge a complaint to a supervising authority – the authority supervising the protection of personal data is the Personal Data Protection Office; you may refer to this authority if you believe that your personal data are not processed in accordance with applicable law.

If you want to demand access to your personal data, to correct or delete them, if you want to use the right to limit the processing or the right to object, please complete and submit the following [form](#).