

## PRIVACY POLICY

This privacy policy (hereinafter: Policy) contains the rules pertaining to the data processing of personal data carried out by Jet Travel Kft. (hereinafter: Controller) in relation to its travel organiser and retailer activity as well as the information on data processing. This Policy includes the operation of Controller's website (<https://www.jettravel.hu>) – including without limitation contact information.

Please read this Policy carefully before making any statements on data processing! If you have any questions in relation to this Policy, Controller's colleague shall be at your disposal at the following central email address:

[adatkezeles@jettravel.hu](mailto:adatkezeles@jettravel.hu)

By using the contact functions of the website, you consent to the processing of your personal data for contact purposes. In the event you query about the services provided by Controller and wish to use the Controller's services, then we hereby inform you that we use your data on the basis of point b) of Article 6(1) of the General Data Protection Act [1] (hereinafter: GDPR).

Controller reserves the right to change this Policy partially or in its entirety without prejudice to the security and lawfulness of data processing at any time, therefore we request you to follow up its content regularly! A brief summary of the changes is available for no less than 30 days before such changes take effect at the [changes subpage], however, reviewing information on the changes separately still requires the review of the entire Policy that is consolidated with the changes. The then-current consolidated version of the Policy is available at: LINK.

### 1. Controller

**Controller's name:** "Jet Travel" Idegenforgalmi Szolgáltató és Kereskedelmi Korlátolt Felelősségű Társaság

**Registered office:** 1113 Budapest, Bocskai út 77-79, Building B 3<sup>rd</sup> floor

#### Contact details:

**telephone:** +36 20 406 5334

**email:** [adatkezeles@jettravel.hu](mailto:adatkezeles@jettravel.hu)

### 2. General Framework

2.1 This Policy contains those high-level data protection and data processing principles and rules that Controller accepts to be binding in relation to the provision of its services and its own operation by fully complying with the then-current legal regulations.

The latter shall be part of the Controller's practice without highlighting them in this Policy.

2.2 When creating this Policy, Controller took into consideration the provisions of the GDPR and the Privacy Act [2], the best practices of the National Authority for Data Protection and Freedom of Information, the relevant legal practice, the decisions of the authorities, courts and the Constitutional Court as well as new European trends forming in relation to data protection.

2.3 The notions used in this Policy are in all cases identical to the definitions under Article 4 of the GDPR. The data subject shall be the natural person directly using the services provided by Controller (i.e. person participating in a travel, passenger having a flight ticket etc.).

2.4 Personal data may be supplied in three ways in connection with Controller's services:

a) the data subjects supply their data (e.g. in connection with the organisation of their own travel by Controller);

b) the data is supplied by any of Controller's contract partners, in which case the lawfulness of data processing is presumed by Controller on the basis of the agreement between Controller and the partner, and so is the consent to data processing by the data subject in relation to the data transfer of personal data to the contract partner and to Controller under point a) of Article 6(1) of the GDPR for a purpose related to Controller's services;

c) the data is supplied by an external service provider providing Controller's services as authorised by the data subject.

The data is supplied to Controller freely in all cases, and, in case of point b), on the basis of the agreement between Controller and its contract partner.

2.5 The purpose of data processing is typically the provision of travel organisation services by Controller, i.e. the organisation, preparation and accomplishment of travels as well as surveying customer satisfaction in case of certain trips (e.g. following the completion of cruises and other group travels). Controller will also process data in order to justify the lawfulness of invoices issued by it in relation to the travel, and for the purposes of performing the contract concluded with its contract partner (in case of clause 2.4) and an external service provider (in case of clause 2.5). The purpose and legal basis of individual data process types carried out by Controller is set out in clause 5 in more details.

### **3. Data Used in Connection with Browsing <https://www.jettravel.hu>**

3.1 The website uses cookies, the types of which are detailed below. A cookie is a small text file placed by the websites on the visitors' devices. Cookies are then sent back to the website on each subsequent visit, or to another website that recognizes the cookie. Cookies are used in order to make the website work, or to operate it more efficiently, as well as to provide information to the owners of the website who can then provide a more suitable and personalized

service to the users. Whenever visitors use the website, information may be collected by using cookies and other similar technologies.

### 3.2 Temporary Cookies

These cookies are necessary for the navigation on our website. These are cookies enabling you to log in to the customer page or to place items in your shopping cart. These cookies are replaced in every 30 minutes, or they are deleted after leaving the website. Cookies necessary for login or shopping are deleted after 30 minutes.

### 3.3 Permanent Cookies

These cookies are used in order for your browser to be recognised when you visit our website for the next time. These cookies are stored on your computer until you manually delete them.

### 3.4 Performance Cookies

These cookies are used to collect anonymous data about your user behaviour in relation to our website. These cookies register the visited subpages and links. This enables us to treat your preferences more conveniently when you next time visit our website. This way we can provide you with intriguing information and offers. This data is stored for 30 days.

### 3.5 Functionality Cookies

These cookies serve for saving the settings made by you on our website (e.g. language or font size settings). This way the functionality of our website is improving for the purpose of your convenience. These cookies are deleted after 30 minutes.

### 3.6 Third Party Cookies

These cookies are used to collect anonymous data about your user behaviour in relation to our website. This enables us to treat your preferences more conveniently when you next time visit our website. This way we can provide you with intriguing information and offers.

We use third party cookies in case of Google Analytics, Pingdom, Hotjar, Polyfill, BingAds and GoogleAdwords, in connection with which you may find more details below:

### 3.7 Google Analytics

This website uses Google (Universal) Analytics which is the web analyst service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). Google Analytics uses cookies that analyse the use of our website.

The information collected by the cookies about the use of our website (including your IP address and the URLs of the visited websites) are generally transferred to and stored at the servers of

Google, based in the US. The IP addresses are shortened by activating IP anonymisation on this website before transferred within the member states of the European Union or to the member states of the European Economic Community. In exceptional cases, the full IP address is transferred to the US based Google servers where it is shortened. Google uses this information for our benefit, in order to analyse your user behaviour at our website, to prepare reports about the activities of the website and provide us further services in relation to the website and internet use. The anonymous IP address transferred about your browser by Google Analytics is not merged with Google's other data. This data is stored for 6 months.

We do not store data collected by Google Analytics.

You may prohibit the collection of data generated by cookies and concerning the use of the website (including your IP address) to Google as well as the processing of the same by Google if you download and install Browser Plugin available at <http://tools.google.com/dlpage/gaoptout?hl=de>

Detailed information on Google's terms of service and privacy policy is available at <https://marketingplatform.google.com/about/analytics/terms/us/> and <https://policies.google.com/?hl=en-US>

The lawfulness of our cookie usage is ensured by your consent and our legitimate interest concerning the achievement of the purposes set out at individual cookie types.

### 3.8 HotJar

This website uses the analysis software of Hotjar Ltd. (<http://www.hotjar.com>, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta, Europe) („Hotjar“). With the help of Hotjar, the user behaviour on our website (clicks, mouse operations, scrolls, etc.) can be measured and evaluated. The information generated on our website about your visit by the “Tracking Code” and the cookies during the process are transferred to and stored at the Hotjar server in Ireland. The following (anonymous) information is collected by the Tracking Code: the screen size of your device, the type of your device, browser information, geographical position (country only), preferred language for the display of our website, user interactions, mouse operations (moves, position and clicks), keyboard activity and Log data.

These cookies are deleted after 365 days.

We do not store HotJar information.

You can only prohibit the storage of HotJar cookies by the appropriate setting of your browser, where you need to run your browser in a private/incognito window. You can find more details on Hotjar's terms of use and privacy policy at: <https://www.hotjar.com/legal/policies/privacy>.

The lawfulness of our cookie usage is ensured by your consent and our legitimate interest concerning the achievement of the purposes set out at individual cookie types.

#### **4. Scope of Processed Data**

4.1 Controller, in relation to the provision of its services, will only process the data subjects' personal data included in this Policy, which comprises the following:

a) in case of corporate trips:

- name
- email address
- mobile phone number
- gender
- date of birth
- passport number (issue date, expiry date)
- special dietary requirements

b) in case of incentive trips:

- name
- email address
- mobile phone number
- gender
- date of birth
- passport number (issue date, expiry date)
- ID card number
- special dietary requirements

c) in case of events:

- name

- email address
- mobile phone number
- special dietary requirements

d) in case of cruise, adventure and sports trips:

- name
- email address
- mobile phone number
- date of birth
- passport number (issue date, expiry date)
- ID card number
- special dietary requirements

e) in case of flight ticket purchases:

- name
- email address
- mobile phone number
- gender
- date of birth
- passport number (issue date, expiry date)
- special dietary requirements

f) for contact purposes:

- name
- email address

- phone number

4.2 In connection with the provision of the services, Controller further processes data necessary for invoicing, such as the traveller's name, the destination, the date and fee of the trip, the charged costs and the invoicing address (which qualifies as personal data if the invoice is paid by a private person). Controller will store this invoicing data for 8 years following the issue year of the invoice.

## **5. Other Characteristics of the Processing**

5.1 Controller will not verify the suitability and truthfulness of data supplied by the data subjects as well as contract partners and external partners. The stipulation under points b) and c) of clause 2.4 concerning the lawful processing of data supplied by contract partners or external partners as well as the availability of this Policy is contained by the agreement between Controller and the contract partner. In case of data supplied on the basis of the latter, Controller will not individually verify the lawfulness of processing and the data subject's consent and will consider the same as justified.

5.2 Controller will process data for the performance of the contract on the travel service and the justification of the invoices for 5 years after the end of the travel. In connection with the order of a new service during this period, Controller will presume that, by ordering the new service, the data subject consents to the processing of data already in place for the purposes of the organisation, preparation and accomplishment of the travel and, furthermore, the fulfilment of mandatory data supplies in order to avoid repeated data supply. The data subject should inform Controller about any data that has changed.

5.3 If the data subject surely does not use Controller's service, then his or her personal data will be erased within 1 month from the supply of the same.

5.4 Controller will transfer personal data to third parties for the provision of the service, the organisation and accomplishment of travels, including without limitation to hotels, operators of flight ticket booking systems, flight ticket selling companies, car rental companies, cruise companies ensuring the travel, travel insurance companies, etc. The data subject's data may only be transferred to a person who provides a direct service to the data subject in connection with the travel.

5.5 With respect to clauses 4.1 a) and e) and, on a case-by-case basis (if the travel requires the purchase of flight tickets) with respect to clauses 4.1 b), c) and d), data subjects consent to Controller uploading their personal data to flight ticket booking systems in order for the data of the data subjects as people potentially participating in trips to be included in said systems during the performance of the agreements under clause 2.4 b). By such uploading, personal data should not be supplied again through contract partners. Data will be erased from these systems in accordance with clauses 5.2 and 5.3.

5.6 The provision of certain services requires the transfer of data to third countries that Controller will carry out at all times in accordance with Articles 45, 46 and 49 of the GDPR. In the event the data subject's consent under Article 49 of the GDPR is required for such data transfer, then Controller will give the data subject a prior notice via email.

5.7 Furthermore, Controller processes the personal data of applicants submitting job applications to Controller (including without limitation data included in the resume or the application). Unless otherwise requested by the applicant, Controller will erase all data related to job applications within 7 days from the successful accomplishment of the probation period after filling the given position.

5.8 Controller also processes the personal data of people applying for the Edutus training as supplied by the data subjects in their resume. Controller will erase such data within 30 days after the accomplishment of the training.

5.9 Controller would not be able to operate in relation to its travel organisation activity and to carry out its employee hiring and training processes without data processing, therefore such data processing is essential for the performance of travel services, training and employment agreements and is limited to the minimal scope of data required for such agreements. Data subjects may freely supply their data in all cases. In such case, the lawfulness of processing is ensured by the fact that the processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.

5.10 In case of a request for a quote, Controller will process the querying person's data (such as name, email address, telephone number and contact name, email address and telephone number), which shall be erased within 30 days from the expiry of the deadline open for the acceptance of the quote.

5.11 Controller may process data for the purposes of sending newsletters. Controller will only send newsletters to people subscribed to such service (in the course of completing customer satisfaction surveys and by filling out the relevant consent form at events). Controller will not transfer the personal data of newsletter subscribers to any third parties. In such cases, the consent to processing may be withdrawn at any time, which will not affect the lawfulness of processing based on consent before its withdrawal. In such cases, the data will be processed until the withdrawal of the consent.

5.12 Stored data can only be accessed by the Controller's employees authorised to do so for the purposes set out in this Policy. Data processing is regulated by internal policies, and processing shall be carried out at all times in compliance with such policies. Controller does not use any data processor or further controller.

5.13 The use of unlawful or misleading data or the misuse of personal or sensitive data may constitute crimes or give rise to civil law claims. In such cases, Controller has the right to store the data for the duration of the procedure to be carried out.



5.14 Controller is obliged to transfer all available and lawfully stored data to the competent authorities as per the applicable regulations or upon a final and binding decision of an authority. Controller may not be held liable for the transfer of any such data or any consequences of such transfer.

## **6. The Data Subject's Rights and Remedies**

6.1 In relation to the data processing, all requests and statements shall be made to Controller in writing only (via registered mail or email), which shall be deemed to have been delivered on the day of confirmed delivery to the address in case of delivery by post, and on the following working day in case of delivery via email (in lack of a reply message on the failure of delivery).

6.2 Controller will comply with or reply to the data subject's requests under Chapter III of the GDPR without delay but no later than within 3 working days. The data subject's rights under Chapter III of the GDPR shall comprise the right of access (Article 15), the right to rectification (Article 16), the right to erasure (Article 17), the right to restriction of processing (Article 18) and, in the event the relevant legal conditions are met, the right to object (Article 21). The data subjects can also request access to their data in .doc format in accordance with their right to data portability.

6.3 In the course of its activity, data processing and data transfer, Controller will in no event change the data in any form, save for rectifications upon the data subjects' requests.

6.4 By contacting the Controller, any data subject can request the erasure of any of his or her personal data (withdrawal of consent to processing). Controller shall comply with such requests without delay but, in any case, no later than within 3 working days.

6.5 By the erasure of data, the data used for the identification of the user and stored in the Controller's system and the system specified in clause 5.5 will be erased, and, accordingly, the data subject will need to resupply the data required for the organisation and accomplishment of the travel if the service is used repeatedly. This clause shall not affect the erasure of data related to the justification of legal obligations as well as obligations towards contract partners [clause 2.4 b)] and external service providers [clause 2.4 c)]. This data may only be erased after the expiry of the deadline prescribed by the law, therefore the right to withdraw the consent to processing is limited in such cases.

6.6 In accordance with the Privacy Act and Act V of 2013 on the Civil Code, the users may exercise their rights before the competent courts and may request the procedure of the National Authority for Data Protection and Freedom of Information [1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf. 9., email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), telephone: +36 (1) 391-1400, +36 (30) 683-5969, +36 (30) 549-6838, fax: +36 (1) 391-1410] in any matters related to personal data.

5<sup>th</sup> March 2024

[1] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: GDPR)

[2] Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: "Privacy Act")