

**PLATINUM TRAVEL SOLUTIONS KFT.**

**PRIVACY POLICY**

**Valid as of 25.05.2018**

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## 1. DATA CONTROLLER AND CONTACT DETAILS

**Platinum Travel Solutions Korlátolt Felelősségű Társaság** (registered seat: H-1071 Budapest, Damjanich utca 11-15, Hungary; company reg.no.: Cg. 01-09-272183) (the „**Company**” or „**Data Controller**”) is the data controller for processing the personal data of its current, former and future clients and contractual partners.

## 2. LEGAL REGULATIONS OF DATA PROCESSING

Legal regulations underlying the data processing are particularly the following:

- Act CXII of 2011 on the Right of Informational Self-Determination and on the Freedom of Information („**Information Act**”);
- Regulation (EU) 2016/679/EU 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 („**GDPR**”);
- Act V of 2013 on the Civil Code („**Civil Code**”) and
- Act C of 2000 on Accounting („**Accounting Act**”).

## 3. DEFINITIONS

This section stipulates the definition of key privacy terms. The definitions are based on the definitions given by the GDPR and also includes a short explanation thereof:

**data controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**data processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**data processor:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**GDPR:** Regulation (EU) 2016/679/EU 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;

**supervisory authority** or **NAIH:** Nemzeti Adatvédelmi és Információszabadság Hatóság being the Hungarian supervisory authority in respect of data protection issues;

**personal data:** means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**client:** anyone requesting information about the Data Controller’s products or services in person, through Data Controller’s website ([www.platinumtravel.hu](http://www.platinumtravel.hu)), via e-mail, by telephone or any other means, or persons entering into a travel contract (or a contract for relating services) with Data Controller.

#### 4. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

Data Controller shall take appropriate measures to ensure that personal data relating to clients are always:

- (a) processed lawfully and fairly and using a proper legal basis (lawfulness, fairness and transparency);
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation);
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (accuracy);
- (e) kept in a form which permits identification of clients (storage limitation);
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality).

#### 5. PERSONAL DATA PROCESSED BY DATA CONTROLLER, PURPOSE, LEGAL BASIS AND DURATION THEREOF

Data Controller processes the following personal data of its clients for the purposes and during the term as indicated below:

<b>1. Inquiry about the Company's services in person, through website, via e-mail, by telephone, request for a specific offer</b>	
<b>Scope of processed data</b>	The requesting person's (client's): <ul style="list-style-type: none"> <li>a) name,</li> <li>b) if the passenger is a minor, his/her date of birth,</li> <li>c) e-mail address,</li> <li>d) telephone number,</li> <li>e) if the client is a natural person, the subject of the inquiry: destination; date and duration of the travel; classification of the requested accommodation; means of travel (specification of the vehicle to be used for travel) and the relating frequent flyer information; any other services indicated by the client when requesting for information.</li> </ul>
<b>Purpose of data processing</b>	If the client requests for information regarding any of the Company's services, either personally or through the website, via e-mail or by telephone, the Company processes the respective personal data with the purpose of providing the requested offer as well as discussing the issues related thereto, in order to contact the client and maintain contact as being necessary steps prior to the signing of the travel contract.

<b>Legal basis of data processing</b>	Legal basis for data processing is <i>to take steps at the request of the client prior to entering into a contract</i> (namely, determining the subject matter, the fees and the main terms and conditions of the travel contract) [point b) of paragraph (1) of Article 6 of the GDPR].
<b>Duration of data processing</b>	The above data processing lasts until the entering into the travel contract between the client and the Company, except for the client does not accept the Company's offer and does not conclude a travel contract. In this case, the Company processes those personal data until the client explicitly refuses the offer, provided that if the client does not reject the offer explicitly and unambiguously (including the case if the offer is not answered at all) the data will be processed until the expiry date of the offer as determined by the Company. Personal data will be deleted following the expiry date.
<b>Data processor(s)</b>	The following company provides cloud computing and other IT services to the Company: <ul style="list-style-type: none"> <li>• SYSTEMFARMER Kft. (registered seat: H-1119 Budapest, Petzvál József utca 28, 1<sup>st</sup> floor, no. 2, Hungary), a Microsoft certified consultancy company, with whom the Company entered into a written contract on 19.06.2017.</li> </ul>
<b>Transfer of personal data / Persons that may have access to personal data</b>	For the purposes of performing the travel contract, the Company may, in accordance with the client's requests, forward the minimally required information about the client(s) to the following companies: <ul style="list-style-type: none"> <li>• airlines;</li> <li>• railway undertakings;</li> <li>• shipping companies;</li> <li>• hotels and other accommodation facilities;</li> <li>• transfer companies;</li> <li>• car rental service providers;</li> <li>• the following insurance companies: Európai Utazási Biztosító Zrt. (registered seat: H-1132 Budapest, Váci út 36-38, Hungary) - date of the written contract: 10.10.2016; as well as the Hungarian Branch of Colonnade Insurance SA (registered seat: H-1143 Budapest, Stefánia út 51, Hungary) - date of the written contract: 01.07.2016;</li> <li>• in the case of airlines, the Company regularly uses Amadeus reservation system, provided by AMADEUS Magyarország Idegenforgalmi és Számítástechnikai Szolgáltató Kft. (registered seat: H-1075 Budapest, Madách Imre út 13-14, Hungary) - date of the written contract: 01.10.2016.</li> </ul>
<b>2. Entering into and performing a travel contract</b>	
<b>Scope of processed data</b>	The client's / clients': <ol style="list-style-type: none"> <li>a) name;</li> <li>b) type, number, date of issue and date of expiry of the document used for identification purposes when travelling;</li> <li>c) nationality;</li> <li>d) date of birth;</li> <li>e) e-mail address;</li> <li>f) telephone number;</li> </ol>

	<p>g) if the passenger is an unaccompanied minor, the name, the type, number, date of issue and date of expiry of the identification document, nationality and date of birth of the legal representative;</p> <p>h) if the client requires car rental services, the number, date of issue and date of expiry of his/her driving license;</p> <p>i) if the client is a natural person, the subject of the inquiry: destination; date and duration of the travel; classification of the requested accommodation; means of travel (specification of the vehicle to be used for travel) and the relating frequent flyer information; any other services indicated by the client when requesting for information (e.g. transfer services, insurance services, etc.).</p>
<b>Purpose of data processing</b>	<ul style="list-style-type: none"> <li>• data and information essentially required for the identification of the client (incl. identification during the performance of the relevant contract): data referred to under points a) – d) and g) - h) above;</li> <li>• data and information essentially required for keeping connection with the client: data referred to under points e) – f) above;</li> <li>• data and information necessary for determining the subject of the contract: data referred to under point i) above</li> </ul>
<b>Legal basis of data processing</b>	Legal basis for data processing is the <i>performance of a contract</i> [point b) of paragraph (1) of Article 6 of the GDPR], including the settlement of potential legal disputes arising from or in connection of thereof.
<b>Duration of data processing</b>	5 (five) years as of the date of performance of the contract – in accordance with the Civil Code
<b>Data processor(s)</b>	<p>The following company provides cloud computing and other IT services to the Company:</p> <ul style="list-style-type: none"> <li>• SYSTEMFARMER Kft. (registered seat: H-1119 Budapest, Petzvál József utca 28, 1<sup>st</sup> floor, no. 2, Hungary), a Microsoft certified consultancy company, with whom the Company entered into a written contract on 19.06.2017.</li> </ul>
<b>Transfer of personal data / Persons that may have access to personal data</b>	<p>For the purposes of performing the travel contract, the Company may, in accordance with the client's requests, forward the minimally required information about the client(s) to the following companies:</p> <ul style="list-style-type: none"> <li>• airlines;</li> <li>• railway undertakings;</li> <li>• shipping companies;</li> <li>• hotels and other accommodation facilities;</li> <li>• transfer companies;</li> <li>• car rental service providers;</li> <li>• the following insurance companies: Európai Utazási Biztosító Zrt. (registered seat: H-1132 Budapest, Váci út 36-38, Hungary) - date of the written contract: 10.10.2016; as well as the Hungarian Branch of Colonnade Insurance SA (registered seat: H-1143 Budapest, Stefánia út 51, Hungary) - date of the written contract: 01.07.2016;</li> </ul>

	<ul style="list-style-type: none"> <li>in the case of airlines, the Company regularly uses Amadeus reservation system, provided by AMADEUS Magyarország Idegenforgalmi és Számítástechnikai Szolgáltató Kft. (registered seat: H-1075 Budapest, Madách Imre út 13-14, Hungary) - date of the written contract: 01.10.2016.</li> </ul>
<b>3. Flight ticket and other ticket sales</b>	
<b>Scope of processed data</b>	<p>The client's / clients':</p> <ol style="list-style-type: none"> <li>name;</li> <li>type, number, date of issue and date of expiry of the document used for identification purposes when travelling;</li> <li>nationality;</li> <li>date of birth;</li> <li>e-mail address;</li> <li>telephone number;</li> <li>if the passenger is an unaccompanied minor, the name, the type, number, date of issue and date of expiry of the identification document, nationality and date of birth of the legal representative;</li> <li>if the client is a natural person, the subject of the inquiry: destination; date and duration of the travel; classification of the requested accommodation; means of travel (specification of the vehicle to be used for travel) and the relating frequent flyer information; any other services indicated by the client when requesting for information (e.g. transfer services, insurance services, etc.).</li> </ol>
<b>Purpose of data processing</b>	<ul style="list-style-type: none"> <li>data and information essentially required for the identification of the client (incl. identification during the performance of the relevant contract): data referred to under points a) – d) and g) above;</li> <li>data and information essentially required for keeping connection with the client: data referred to under points e) – f) above;</li> <li>data and information necessary for determining the subject of the contract: data referred to under point h) above</li> </ul>
<b>Legal basis of data processing</b>	Legal basis for data processing is the <i>performance of a contract</i> [point b) of paragraph (1) of Article 6 of the GDPR)], including the settlement of potential legal disputes arising from or in connection of thereof.
<b>Duration of data processing</b>	5 (five) years as of the date of performance of the contract – in accordance with the Civil Code
<b>Data processor(s)</b>	<p>The following company provides cloud computing and other IT services to the Company:</p> <ul style="list-style-type: none"> <li>SYSTEMFARMER Kft. (registered seat: H-1119 Budapest, Petzvál József utca 28, 1<sup>st</sup> floor, no. 2, Hungary), a Microsoft certified consultancy company, with whom the Company entered into a written contract on 19.06.2017.</li> </ul>

<b>Transfer of personal data / Persons that may have access to personal data</b>	<p>For the purposes of performing the travel contract, the Company may, in accordance with the client's requests, forward the minimally required information about the client(s) to the following companies:</p> <ul style="list-style-type: none"> <li>• airlines;</li> <li>• railway undertakings;</li> <li>• shipping companies;</li> <li>• transfer companies;</li> <li>• the following insurance companies: Európai Utazási Biztosító Zrt. (registered seat: H-1132 Budapest, Váci út 36-38, Hungary) - date of the written contract: 10.10.2016; as well as the Hungarian Branch of Colonnade Insurance SA (registered seat: H-1143 Budapest, Stefánia út 51, Hungary) - date of the written contract: 01.07.2016;</li> <li>• in the case of airlines, the Company regularly uses Amadeus reservation system, provided by AMADEUS Magyarország Idegenforgalmi és Számítástechnikai Szolgáltató Kft. (registered seat: H-1075 Budapest, Madách Imre út 13-14, Hungary) - date of the written contract: 01.10.2016.</li> </ul>
<b>4. Invoicing</b>	
<b>Scope of processed data</b>	<p>If the above services are provided to and purchased by a natural person (incl. private entrepreneurs as well), the relevant person's (the client's):</p> <ol style="list-style-type: none"> <li>a) name;</li> <li>b) address (registered seat);</li> <li>c) tax number.</li> </ol>
<b>Purpose of data processing</b>	<p>Data and information essentially required for invoicing purposes.</p>
<b>Legal basis of data processing</b>	<p>Legal basis for data processing is the <i>compliance with a legal obligation to which the Data Controller is subject</i> [point c) of paragraph (1) of Article 6 of the GDPR)], namely, the compliance with the obligation to issue an invoice in accordance with Sections 165-166 of the Accounting Act.</p>
<b>Duration of data processing</b>	<p>8 (eight) years of the date of issue of the invoice (Section 169 of the Accounting Act).</p>
<b>Data processor(s)</b>	<p>The following company provides cloud computing and other IT services to the Company:</p> <ul style="list-style-type: none"> <li>• SYSTEMFARMER Kft. (registered seat: H-1119 Budapest, Petzvál József utca 28, 1<sup>st</sup> floor, no. 2, Hungary), a Microsoft certified consultancy company, with whom the Company entered into a written contract on 19.06.2017.</li> </ul> <p>The Company uses the software called 'Nagy Utazás 3' for invoicing purposes, whose below owner and developer may have access to personal data uploaded by the Company:</p> <ul style="list-style-type: none"> <li>• FOLTnet Kft. (registered seat: H-1147 Budapest, Csömöri út 48, 2<sup>nd</sup> floor 15, Hungary), with whom the Company entered into a written contract on 21.11.2016.</li> </ul>

<b>Transfer of personal data / Persons that may have access to personal data</b>	The Company entered into an engagement agreement with CÉGKOMPLEX Kft. (registered seat: H-2030 Érd, Diósdí út 42, Hungary) for bookkeeping services, who qualifies as third party, independent data controller.  In the case of fiscal control: the Hungarian Tax Authority.
<b>5. Personal data of contractual partners</b>	
<b>Scope of processed data</b>	The following data of the contact persons (being natural persons) of the Company's contractual partners a) name; b) e-mail address and telephone number.  If the contractual partner is a natural person (incl. private entrepreneurs as well), the relevant person's: c) address (registered seat); d) tax number.
<b>Purpose of data processing</b>	Data and information essentially required for keeping connection with the contractual partners, for cooperation and for the compliance of the contract.
<b>Legal basis of data processing</b>	Legal basis for data processing is the <i>performance of a contract</i> [point b) of paragraph (1) of Article 6 of the GDPR], including the settlement of potential legal disputes arising from or in connection of thereof.
<b>Duration of data processing</b>	5 (five) years as of the date of performance of the contract – in accordance with the Civil Code
<b>Data processor(s)</b>	The following company provides cloud computing and other IT services to the Company: <ul style="list-style-type: none"> <li>• SYSTEMFARMER Kft. (registered seat: H-1119 Budapest, Petzvál József utca 28, 1<sup>st</sup> floor, no. 2, Hungary), a Microsoft certified consultancy company, with whom the Company entered into a written contract on 19.06.2017.</li> </ul>
<b>Transfer of personal data / Persons that may have access to personal data</b>	The Company entered into an engagement agreement with CÉGKOMPLEX Kft. (registered seat: H-2030 Érd, Diósdí út 42, Hungary) for bookkeeping services, who qualifies as third party, independent data controller.  In the case of fiscal control: the Hungarian Tax Authority.

## 6. RECIPIENTS AND TYPE OF RECIPIENTS

As outlined in Section 5 above, Data Controller usually transfers personal data to the following third party data controllers, i.e. on a 'from a data controller to a data controller' basis:

- (a) to legal entities providing services to Data Controller and/or to the clients (e.g. insurance companies, companies providing bookkeeping services to Data Controller);

- (b) to third parties involved in the performance of the travel contract (including, particularly airlines, railway undertakings, shipping companies, as well as hotels, accommodation facilities, transfer service providers and car rental providers in the country of destination);
- (c) to the supervisory authority and other authorities (e.g. the Hungarian Tax Authority).

The clients may request for personalized information about the processing of their personal data by Data Controller (incl. the purpose, legal basis, scope, duration of processing of personal data, data transfer, etc.), which can be obtained at the following contact point: **Mr. Balázs Borsányi**; e-mail address: **balazs.borsanyi@platinumtravel.hu**; telephone number: **+36-30-911-0096**.

## **7. INTERNATIONAL DATA TRANSFER TO THIRD COUNTRIES**

The client's personal data may also be transferred to data controllers and data processors located in countries outside the European Economic Area (i.e. third countries) if the European Commission has decided that the third country concerned ensures an adequate level of protection (subsection (1) of Article 45 of the GDPR) or, in the absence of such a conformity decision of the European Commission, where third-country data controllers and data processors have provided appropriate safeguards so that the adequate level of protection of the client's personal data is also provided for by the recipients outside the European Union as follows (Article 46 of the GDPR):

- a) through the general data protection clauses adopted by the Commission in accordance with the Committee procedure referred to in Article 93 (2) of the GDPR;
- b) through general data protection clauses adopted by the supervisory authority and approved by the Commission in accordance with the Committee procedure referred to in Article 93 (2) of the GDPR;
- c) by way of codes of conduct, as provided for in Article 40 of the GDPR, with binding and enforceable commitments by the third country data controller or data processor to apply appropriate safeguards, including those relating to the rights of the data subjects; or
- d) an approved certification mechanism in accordance with Article 42 of the GDPR with a binding and enforceable commitment by the third country data controller or data processor to apply the appropriate safeguards, including the rights of the data subject. In this regard, Data Controller seeks to approve contractual privacy specimens approved by the European Commission / NAIH with third-country partners.

Annex No 1 of this brochure lists those countries located outside the European Economic Area for which the European Commission has adopted a conformity decision.

In the absence of a European Commission's compliance decision or, in the absence appropriate safeguards as specified above, the client's personal data may only be transferred to a third country if the data transfer is inevitably necessary for the fulfilment of the contract between Data Controller and the client and/or if the client has given express and informed consent to such data transfer (GDPR Article 49).

As of the date of this privacy policy, if the client requests for services on the basis of the travel contract (or other related services contract), entered into with Data Controller, in a third country not listed in Annex No 1, Data Controller is allowed to transfer to that third country exclusively those personal data that are necessary for the provision of services in question.

## **8. RIGHT TO ACCESS TO PERSONAL DATA**

The client shall have the right to access to their personal data at any time. The client shall have the right to obtain from Data Controller confirmation as to whether or not personal data concerning him or her are being processed. Data Controller is obliged to provide such information.

The right to obtain confirmation as to whether Data Controller processes his or her personal data:

- (a) applies to the personal data relating to the client obtaining conformation;
- (b) does not apply to anonymous data;
- (c) does not apply to personal data not related to the relevant client; and
- (d) includes clearly identifiable pseudonymised data associated with the relevant client.

Data Controller shall provide access to and a copy of the client's personal data undergoing processing. For any further copies requested by the client, Data Controller may charge a reasonable fee on administrative costs incurred in the fulfilment of the request by notifying the client in advance.

## **9. RIGHT TO RECTIFICATION**

The client shall have the right to rectification. The right to rectification:

- (a) applies to the personal data relating to the client obtaining the rectification;
- (b) does not apply to anonymous data;
- (c) does not apply to personal data not related to the relevant client; and
- (d) includes clearly identifiable pseudonymised data associated with the relevant client.

Data Controller shall rectify the inaccurate personal data or complete the incomplete personal data upon the client's request. Data Controller shall inform the recipients of such personal data (if any) about the rectification of those personal data. However, Data Controller shall not inform the recipients if this proves impossible or involves disproportionate effort.

## **10. RIGHT TO ERASURE**

The client may have the right to erase his or her personal data subject to certain conditions.

Data Controller shall have the obligation to erase personal data of the client without undue delay, if:

- (a) Data Controller processes the relevant personal data; and
- (b) the client obtains the erasure of his or her personal data; and
- (c) the personal data are no longer necessary in relation to the purposes for which they are processed.

Data Controller shall have the obligation to erase personal data of the client without undue delay, if:

- (a) Data Controller processes the relevant personal data; and
- (b) the client obtains the erasure of his or her personal data; and
- (c) the client withdraws consent on which the data processing is based; and
- (d) there is no other legal ground for the processing.

Data Controller shall have the obligation to erase personal data of the client without undue delay, if:

- (a) data processing is necessary for the purposes of the legitimate interests pursued by Data Controller or by a third party; and
- (b) the client objects to the processing of personal data; and
- (c) there are no overriding legitimate grounds for the processing of such personal data.

Data Controller shall have the obligation to erase personal data of the client without undue delay, if:

- (a) the client obtains the erasure of his or her personal data; and

- (b) the relevant personal data have been unlawfully processed; or
- (c) the personal data have to be erased for compliance with a legal obligation; or
- (d) the relevant personal data have been collected in relation to the offer of information society services.

Data Controller shall inform the recipients of such personal data (if any) about the erasure of those personal data. However, Data Controller shall not inform the recipients if this proves impossible or involves disproportionate effort.

## **11. RIGHT TO RESTRICTION OF PROCESSING**

The client shall have the right to obtain restriction of processing of his or her personal data.

The right to obtain restriction of processing:

- (a) does not apply to anonymous data;
- (b) applies to the personal data relating to the client obtaining restriction of processing;
- (c) does not apply to personal data not related to the relevant client; and
- (d) includes clearly identifiable pseudonymised data associated with the relevant client.

Data Controller shall restrict the processing of personal data for a period enabling the Data Controller to verify the accuracy of the personal data, if the accuracy of the personal data is contested by the client.

Data Controller shall restrict the processing of personal data if the processing is unlawful and the client opposes the erasure of the personal data and requests the restriction of their use instead.

Data Controller shall restrict the processing of personal data, if:

- (a) the client obtains the restriction of processing of his or her personal data; and
- (b) Data Controller no longer needs the personal data for the purposes of the processing; and
- (c) the client requires the relevant personal data for the establishment, exercise or defence of legal claims.

Data Controller shall restrict the processing of personal data, if:

- (a) the client has objected to processing of personal data necessary for the purposes of the legitimate interests pursued by Data Controller; and
- (b) the client is waiting for verification whether the legitimate grounds of Data Controller override those of the client.

Data Controller shall inform the recipients of such personal data (if any) about the restriction of processing of those personal data. However, Data Controller shall not inform the recipients if this proves impossible or involves disproportionate effort.

If Data Controller restricts the processing of personal data, then Data Controller may:

- (a) store the relevant personal data;
- (b) process the relevant personal data on the basis of the client's consent; or
- (c) process the relevant personal data for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

Data Controller shall not use the personal data of the client for direct marketing purposes, including profiling and automated individual decision-making.

## **12. RIGHT TO DATA PORTABILITY**

The client shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right

to transmit those data to another controller without hindrance (where technically possible) from the controller to which the personal data have been provided, if the data processing is based on consent or on a contract and the processing is carried out by automated means.

The right to data portability:

- (a) does not apply to anonymous data;
- (b) applies to the personal data relating to the client obtaining restriction of processing;
- (c) does not apply to personal data not related to the relevant client; and
- (d) includes clearly identifiable pseudonymised data associated with the relevant client.

### **13. ADMINISTRATION DEADLINE APPLICABLE FOR THE REQUESTS OF THE CLIENT AS DATA SUBJECT**

Data Controller shall respond to the client's above referred requests as follows:

<b>Request of data subject</b>	<b>Deadline</b>
Right to information	when data is collected (if data is collected from data subject) or within 1 (one) month (if data is collected from a person other than data subject)
Right to access	1 (one) month
Right to rectification	1 (one) month
Right to erasure	without undue delay
Right to restriction of processing	without undue delay
Right to data portability	1 (one) month
Right to object	when the object is received

### **14. RIGHT TO FILE A COMPLAINT**

If the client believes that his or her rights have been violated, Data Controller recommends that the client initiate consultations with Data Controller by contacting the person indicated in this privacy policy above (Mr. Balázs Borsányi; e-mail: balazs.borsanyi@platinumtravel.hu; phone number: +36-30-911-0096). If such consultations do not solve the problem or if the client does not wish to initiate consultations, he or she may turn to the court or NAIH being the supervisory authority in Hungary. In case of initiating court proceedings, the client may decide to initiate the proceedings before the court of jurisdiction as of his or her permanent residence.

The contact details of NAIH are as follows: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C, Hungary; phone number: +36 1 391 1400; fax number: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu.

### **15. MODIFICATION OF THE PRIVACY POLICY**

Data Controller shall reserve the right to modify this privacy policy unilaterally at any time. Data Controller shall inform the clients of such modifications by e-mail (in certain cases) and in accordance with applicable laws. The applicable privacy policy being in force shall also be available on the website of Data Controller (www.platinumtravel.hu).

## **Annex No. 1**

In the case of the following countries, located outside the European Economic Area (i.e. third countries), the European Commission has adopted a conformity decision, according to which, in these third countries an adequate level of protection of the clients' personal data is ensured:

- Andorra,
- Argentina,
- Canada (Limited to Commercial Organizations),
- Faroe Islands,
- Guernsey island,
- Israel,
- The Isle of Man,
- Jersey Island,
- New Zealand,
- Switzerland,
- Uruguay and
- United States of America [restricted to the organisations participating in the so-called data protection shield ([Privacy Shield](#))].