

This Privacy Notice (hereinafter the Notice) sets the rules governing the processing of personal data in the course of the tour operator and travel agency activities by Jet Travel Kft. (hereinafter the Controller), including the information on data processing. The Notice shall also apply to actions taken in relation to the website of the Controller (<https://www.jettravel.hu>), in particular to communication and contact.

Before signing any privacy statement, please make sure to read this privacy notice closely and carefully! Should you have any questions concerning its content, do not hesitate to contact Jet Travel Kft. and write to the email address below:

adatkezeles@jettravel.hu

By using the contact function of the website, you give your consent to the processing of your personal data for communication purposes. If you are inquiring about or wish to order the services of the Controller, you are hereby informed that your personal data are processed pursuant to Article 6(1)(b) of the General Data Protection Regulation[1] (hereinafter the GDPR).

Furthermore, the Controller reserves the right to amend this Notice, in whole or in part, without violating the security and lawfulness of data processing. So you are kindly requested to regularly monitor and check the content hereof. A brief summary of each amendment will be published on [\[modifications page\]](#) at least 30 days before the effective date, however, a review of the information on amendments in itself shall not be sufficient, the consolidated version of the privacy notice will still need to be read and reviewed. The consolidated version of the privacy notice is available at: [LINK](#).

The Name of the Controller: "Jet Travel" Idegenforgalmi Szolgáltató és Kereskedelmi Korlátolt Felelősségű Társaság

Registered seat: 1113 Budapest, Bocskai út 77-79/B 3. em.

NAIH identification number of data processing: [\[redacted\]](#)

Contact details: [\[redacted\]](#)

Phone: +36 1 209 2110

email: adatkezeles@jettravel.hu

General Provisions

2.1 This Notice summarizes those high level data protection and data processing principles and rules, to which the Controller abides itself in connection with its activities and provision of services, in full compliance with the laws and regulations in effect from time to time.

Such laws and regulations shall be incorporated into the Controller's practice, even without a specific reference to them.

2.2 The Privacy Notice has been drafted by the Controller in full consideration of the provisions of the GDPR and the Privacy Act[2], the recommendations of the Hungarian National Authority for Data

Protection and Freedom of Information, the related case law, authority, judicial and Constitutional Court decisions, and the latest European trends in data protection.

2.3 The definitions used herein shall have the same meaning as the definitions stipulated in Article 4 of GDPR. Data subject shall mean a natural person who uses the services of Controller directly (i.e. participates in tours, travels with flight tickets, etc.).

2.4 In connection with the services of the Controller, personal data may be disclosed to the Controller in three ways:

the personal data is disclosed by the data subject itself (for example when the Controller organizes a trip or tour for the data subject);

the personal data is disclosed by the contracted partners of the Controller, in which case the Controller presumes data processing to be lawful based on the relevant contract between the Controller and the contracted partner, and it also presumes the consent of the data subject under Article 6(1)(a) of the GDPR granted to the transfer of its personal data to the contracted partner for purposes related to the services of the Controller;

the personal data is disclosed to the Controller by a third-party provider acting as an intermediary for the services of the Controller, with an authorization given by the data subject to the third-party provider.

Data is always disclosed to the Controller voluntarily, or in the case stipulated in paragraph b), data is disclosed based on the contract between the Controller and the contracted partner.

2.5 The purpose of data processing is the provision of organizing travel-related services by the Controller, i.e. organizing, preparing, and implementing the tours, furthermore assessing surveys in case of certain tours (upon completion boat and other group tours). The Controller also processes the data to prove the justified nature of its invoices issued in connection with the tours, and to perform the contracts concluded with its contracted partners (for Section 2.4) and external service providers (for Section 2.5).

2.6 The Controller [provides] newsletter services only for those who subscribed to such services (by opting for such service in a survey, and by the relevant consent form when attending certain events). The personal data of newsletter subscribers are not transferred by the Controller to third parties.

2.7 Data used in connection with surfing on <https://www.jettravel.hu>

Session Cookies

These cookies are necessary for browsing on our website. Session cookies are for example cookies that enable you to log in to the client page or to place products in your cart. These cookies are replaced after 30 minutes or deleted after you leave the site. The cookies necessary for login and shopping are deleted after 30 minutes.

Persistent Cookies

The purpose of these cookies is to ensure that your browser is recognized when you visit our website the next time. These cookies are stored on your computer until you manually delete them.

Performance Cookies

The purpose of these cookies is to collect anonymous data about your user habits related to our website. These cookies register the visited subsites and links. This allows us to better manage your preferences when you visit our website the next time. This way we can provide you valuable information and offers. We store such data for 30 days.

Functionality Cookies

The purpose of these cookies is to store the settings (such as language or font size settings), which you set on our website. This way the functionality of our website is improved for your benefit and comfort. These cookies are deleted after 30 minutes.

Third-Party Cookies

The purpose of these cookies is to collect anonymous data about your user habits related to our website and other websites. This allows us to better manage your preferences when you visit our website the next time. This way we can provide you valuable information and offers.

Third-Party Cookies are used also in the case of Google Analytics, Pingdom, Hotjar, Polyfill, BingAds, and GoogleAdwords, for more information on them, see the following paragraphs:

Google Analytics

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

The information gained by the cookies about the use of the website (including your IP address and the URL of websites you visited) is generally transferred to and stored on one of the USA-based servers of Google. By activating IP anonymization on this website, IP addresses are shortened prior to being transferred within the member states of the European Union or other signatory states of the Agreement on the European Economic Area. The entire IP address is transferred in only exceptional cases to one of the USA-based servers of Google, where it is shortened. Google uses this information for our benefit, in order to evaluate your user habits on our website, to compile reports on website activities, and to perform further services for us related to website and Internet use. The anonym IP address forwarded from your browser by Google Analytics is not aggregated with other Google data. Such data are stored for 6 months.

We do not store those data that are collected by Google Analytics.

You can prevent Google from collecting data generated by cookies and related to the use of the website (including your IP address), as well as their processing by Google if you download and install the Browser Plugin available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>

For more information on Google's terms and conditions and privacy notices, visit <http://www.google.com/analytics/terms/de.html> and <https://www.google.at/intl/at/policies/>.

The legal basis of our use of the cookies is your consent and our legitimate interest, related to the purposes indicated for each Cookie type.

HotJar

This website uses the analytics software of Hotjar Ltd. (“Hotjar”) (<http://www.hotjar.com>), Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta, Europe. With the help of Hotjar, it is possible to measure and evaluate user habits on our website (clicks, mouse activities, scrolling, etc.). The information generated while doing so, through Tracking Code and cookies on our website related to your visit, is transferred to the server of Hotjar in Ireland, where they are stored. Tracking Code collects the following (anonym) information: screen size of your device, type of your device and browser information, geographic location (only the country), preferred language, the display of our website, user interactions, mouse actions (moving, position, clicks), keyboard activities and Log data.

These cookies will be deleted after 365 days.

We do not store Hotjar information.

You can prevent Hotjar cookies from being stored by applying the relevant settings on your browser, for this you need to run the browser in private/incognito mode. For more information on Hotjar's terms and conditions and privacy notices, visit <https://www.hotjar.com/legal/policies/privacy>.

The legal basis of our use of the cookies is your consent and our legitimate interest, related to the purposes indicated for each Cookie type.

Categories of Data Processed

3.1 In connection with the provision of services, the Controller only processes the personal data of data subjects included in this Notice, including the following:

when organizing corporate tours:

- name
- email
- mobile phone number
- gender
- date of birth
- passport number (date of issuance, expiration date)
- special diet requirements

when organizing incentive tours:

- name
- email
- mobile phone number
- gender
- date of birth
- passport number (date of issuance, expiration date)
- personal ID card number
- special diet requirements

in case of organizing events:

- name
- email
- mobile phone number
- special diet requirements

when organizing cruises, adventure and sport tours

- name
- email
- mobile phone number
- date of birth
- passport number (date of issuance, expiration date)
- personal ID card number
- special diet requirements

when purchasing flight tickets:

- name
- email
- mobile phone number
- gender
- date of birth
- passport number (date of issuance, expiration date)
- special diet requirements

when contacting and communicating:

- name
- email
- phone number

In connection with the provision of services, the Controller also processes data necessary for invoicing, therefore the name of the passenger, the destination and date of the tour, the tour fee, additional costs, and the invoicing address (which is considered personal data if the invoice is paid by a private individual). Such invoicing data are stored by the Controller for 8 years following the year in which the invoice was issued.

3.2 The Controller does not check the compliance and relevance of the [data] disclosed by contracted and third-party partners. The provisions of paragraphs b) and c) of Section 2.4. applicable to the lawful processing of the personal data disclosed by contracted or third-party partners, and the place where this Privacy Notice is available shall be stipulated and set out in the contract between the Controller and the contracted partner. For data disclosed based on such contract, the lawful nature and the data subject's consent is not verified by the Controller on an individual basis, they are considered to be verified.

3.3 The processed data shall be stored by the Controller for an additional 5 years after the year in which the tour was completed, for the purposes of performing the contract, and supporting the validity of invoices. If new services are initiated and used during that period, the Controller presumes that by ordering the new services, the data subject consents to the processing of the already existing data for the purposes of organizing, preparing, and implementing the tour, and performing national data

reporting obligations so that no data reporting would be repeatedly necessary. The data subject shall be responsible for notifying the Controller about changes in its data, if any, that occurred in the meantime.

If the data subject will definitely not use the services of the Controller anymore, his/her personal data will be deleted in 1 month after the disclosure of such data.

3.4 Certain personal data are transferred by the Controller to third parties, including in particular to hotels, operators of flight ticket booking systems, car rental companies, ship operators ensuring the tour, travel insurance companies, etc. as may be required by the nature of the services, for the purposes of providing the services and organizing tours. The data of the data subject can only be transferred to third parties who provide the data subject services directly related to the tour.

3.5 For the purpose of paragraphs a) and e) of Section 3.1, on a case-by-case basis (if the tour requires the purchase of flight ticket) even for paragraphs b), c) and d) of Section 3.1, the data subjects shall grant their consent to the Controller uploading their personal data to the flight reservation system, as persons potentially continuing their participation in the tour in the course of performing the contracts stipulated in paragraph b) of Section 2.4. Uploading ensures that personal data are not disclosed repeatedly by the contracted partners. Data shall be deleted from such system pursuant to Section 3.3.

3.6 The provision of certain services requires data to be transferred to third countries, however, such data transfer shall be performed by the Controller in full compliance with Articles 45, 46, and 49 of the GDPR. If data transfer requires consent under Article 49 of the GDPR, the Controller shall inform the data subject thereof by email prior to the transfer.

3.7 In case of a request for an offer, the Controller shall process the inquiring party's data (in particular the name of the inquirer, email address, phone number, and the name of the contact person, email address, and phone number of the contact person, but deletes such data within 30 days after the expiry of the date open for the acceptance of the offer.

3.8 Furthermore, the Controller shall process the personal data of people applying for positions in connection with vacancy notice (in particular the data included in the CV and the application). Unless the applicant requests otherwise, the Controller shall delete the data collected in connection with the vacancy notices within 7 days following the successful completion of the probation period.

3.9 The Controller shall also process the personal data of applicants related to Edutus courses, which are disclosed by the data subjects in their CV. Such data shall be deleted by the Controller within 30 days following the completion of the course.

3.10 Lack of data processing, would prevent the Controller from performing its activities related to travel management, execute its training and recruitment processes, therefore such data processing is essential for the travel, training, and employment contracts, and at the same time it is limited to the categories of data minimum required for such contracts. Data subjects shall disclose their data on a voluntary basis.

3.11 Stored data may only be accessed by the authorized employees of the Controller and only for the purposes indicated in Sections 2.5 and 2.6. The data processing shall be regulated by internal data privacy policies and shall be performed in full compliance with such policies. The Controller shall not use third-party data processors or sub-processors.

Information Obligation and Rectification Options

3.12 Notices and requests to the Controller may only be sent in written formats (in hard copy if delivered as registered mail or with an acknowledgment of receipt, or electronically in email), and they shall be deemed delivered on the day of their receipt by the addressee if sent by post, and in the absence of an autoreply message of delivery failure on the following business day if sent via email.

3.13 The Controller shall respond to all requests of the data subject under Chapter III of the GDPR [in particular related to the right of access to data (Article 15), the rectification of data (Article 16), the deletion of data (Article 17), and restriction (Article 18)] without delay, but within at least 3 business days. Pursuant to the right to portability of data under Article 20 of the GDPR, data subjects may also request their data to be provided in .doc format.

3.14 In the course of its activities, data processing and transfer, the Controller shall not modify the data in any way, not including rectification requested by the data subject.

3.15 Data subjects may request the deletion of their data via the contact details of the Controller (withdrawal of consent to data processing). The Controller shall comply with the request without delay, but no later than 3 days.

Upon the deletion of the data, data that identify users and are stored in the system of the Controller and in the system indicated in Section 3.5, are deleted, however, should data subjects wish to use the services again, they are required to repeat disclosure of the necessary data to organize and fulfill. This Section shall not apply to data processing necessary for certifying the obligations towards contracted partners (Section 2.4 b)) and third-party providers (Section 2.4 c)); such data may be deleted only following the expiry of the period stipulated by the law, this means the right of withdrawal of consent to data processing can only be exercised with limited extent in connection with such data.

3.16 The use of unlawful or misleading data, or the misuse of personal or sensitive data is a crime, and they can result in civil claims, and should the suspicion of such use or misuse arise, the Controller shall have the right to retain the data for the duration of the proceedings.

3.17 All data available to and lawfully stored by the Controller may and shall be transferred by the Controller to the competent authorities, if the Controller is required to do so by the force of the law or a legal and valid authority order. The Controller shall not be held liable for the transfer of such data and for the consequences arising from such transfer.

3.18 The User may exercise his/her rights pursuant to Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, Act V of 2013 on the Civil Code and before the competent courts, furthermore, it may apply for or initiate proceedings before the Hungarian National Authority for Data Protection and Freedom of Information (1125 Budapest Szilágyi Erzsébet fasor 22/C; postal address: 1530 Budapest, Pf. 5., ugyfelszolgalat@naih.hu, +36 (1) 391-1400).

25 May 2018

[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 (GDPR)

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