

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy sets down how your personal data that you provide to us in connection with the use of our services, when supporting our activities, when participating in our events and programs or by using the website www.senatortravel.eu, is used and protected.

We obtain, store and process personal data that enable us to provide high-quality services to our clients and customers. We also gather personal data in order to develop our activities. When processing and storing your personal data, we act exclusively in compliance with this Personal Data Protection Policy and in compliance with applicable legislation, namely Regulation of the European Parliament and of the Council (EU) 2016/679 of 27th April 2016 (General Data Protection Regulation, hereinafter only “**the Regulation**”) and Act no. 101/2000 Coll., on Personal Data Protection as amended (hereinafter only “**the Act**”).

This Personal Data Protection Policy observes the controller’s information obligation towards our clients, supporters and visitors to the Website as defined in Article 13 of the Regulation.

Basic definitions:

Controller:

Senator Meetings & Incentives s.r.o., registered address: Prague 10 – Vinohrady, Korunní 810, postal code: 101 00, company ID no.: 271 53 223, registered in the Commercial Register at the Municipal Court in Prague, ref. no. C 100318.

Personal data:

Personal data is all information regarding an identified and identifiable person. An identifiable natural person is a natural person that can be identified directly or indirectly, particularly with reference to a certain identifier (for example name, identification number, location information, network identifier) or with reference to one or more special features of a physical, physiological, genetic, psychic, economic, cultural or social identity of such natural person.

How do we obtain your personal data?

It is generally true that we gather and obtain personal data directly from you, as a result of your interaction with us and as a result of your use of our services, or as a result of your participation in or support for our activities, particularly when:

- using our congress tourism services, incentive program development services or intermediary services in the field of tourism
- expressing interest in working for us
- participating in educational, cultural or social events that we organise
- subscribing for our electronic newsletter.

Technical data may be obtained by you visiting the Website in a manner described below in section **Technical data and data on visits to the Website** of this Policy.

Please note that refusal to provide personal data in cases when its provision is requisite for the execution and fulfilment of a contract between us, or in cases when we are obliged to process your personal data in order to fulfil a statutory obligation imposed on us, may result in failure to conclude our contractual relation and failure to provide the given service.

What personal data do we gather?

Most frequently, we may gather and process your following personal data:

- **Identification data**, this data includes particularly: name, surname, user name, title, date of birth, birth certificate number, travel document number;
- **Contact information**, this data includes particularly: mailing/invoicing address, e-mail address, telephone number;
- **Payment and transaction details**, this data includes particularly: bank and payment details, history of orders, payments and receivables;
- **Technical data**, this data includes particularly: information on your visits to the Website and on the sources from which you got connected;
- **Profile information**, this data regards our clients and includes particularly: information on the history of orders, interests, preferences, feedback;
- **Marketing data**, this data includes particularly: your preferences regarding the marketing materials of Senator Meetings & Incentives or its partners and preferred communication method.

In some limited cases, we may also process your special data (e.g. data on your racial or ethnic background, or data concerning your health condition – allergies to food), however, only to the extent to which you provide such data to us yourselves and for purposes enabling the performance of our contract and provision of the service requested by you (e.g. airplane ticket or meals).

We process personal data of children under 13 only in exceptional cases and again only to the extent to which you provide it to us yourselves and for purposes enabling the performance of our contract and provision of the service requested by you. For the processing of personal data of a child, consent of its legal representative is always required.

Reasons for personal data processing

The principal reason why we process your personal data is for us to be able to **provide to you our services** that you have shown interest in, to inform you about our activities and enable you to participate **in our events** that we organise, and **to ensure and constantly increase the security and quality of our services**.

Purposes and legal basis for personal data processing

Personal data processing

a) without consent

We may process your personal data also without your consent in compliance with applicable legislation in case of

- processing that is **requisite for the performance of a contract** or for negotiations leading to the conclusion of a contract (pre-contractual relations) - (order confirmation, payment processing and goods/services delivery; our communication regarding the status of an order/use of services; complaint procedure in case of making claims due to defects),
- processing that is **requisite for the fulfilment of legal (statutory) obligations** imposed on us by generally binding legal regulations (e.g. the Accounting Act etc.).
- processing is requisite for the purpose of our **legitimate interests** including:
 - our interest to inform you on our services and provide to you targeted and relevant information – i.e. for us to be able to offer you similar services and goods that you may be interested in; details are to be found in section **Direct marketing** of this Policy
 - our interest to enable our mutual communication – i.e. so that we can reply to your queries or requests if you contact us;
 - our interest to improve the quality of our services and activities;
 - our interest to promote our fundraising events and activities;
 - our interest to protect and assert our rights – i.e. in order to prevent fraudulent behaviour and breach of our contractual terms and conditions, in order to collect potential claims and to ensure protection of our statutory rights)

b) with consent

In the case of processing that does not fall under the purposes described above, we may do the processing on the basis of a granted valid consent with the processing of personal data, which we will request from you. You shall always be notified of this type of processing and you will be given the possibility to express your consent or disagreement with such processing. Granting of consent is always an expression of free and voluntary will and you are entitled to partly or fully withdraw it at any time ex nunc. We shall not do the given processing without adequate consent.

Senator Meetings & Incentives shall request your consent with your personal data processing particularly in the following cases:

- **for your subscription to our newsletter**
- **for the processing of your special personal data (beyond processing defined by legislation).**

Direct marketing

If you are our customer, your identification and contact details may be used in order to assess what is relevant for you and what you are interested in. On the basis of our legitimate interest, we may send you, via e-mail, offers regarding our services or our social events that we participate in, or also information that you have requested from us. You may cancel the sending of electronic communication at any time.

Your identification and contact details may also be used for the above-described purposes if you subscribe independently to our newsletter.

YOU MAY RAISE AN OBJECTION AGAINST PROCESSING FOR DIRECT MARKETING PURPOSES AT ANY TIME AND YOUR PERSONAL DATA WILL NO LONGER BE PROCESSED FOR THE GIVEN PURPOSE.

How long do we store your personal data?

We store your personal data for the time that is requisite for the provision of services and performance of the contract and for the time prescribed by applicable legislation (e.g. the Accounting Act etc.).

Technical data and data on visits to the Website

The Website uses the Google Analytics service provided by Google, Inc. for the analysis of visits to our Website and its improvement. Google Analytics automatically collects anonymous information on visits to this website by means of cookies.

- Detailed information on Google Analytics and personal data protection can be found at <http://www.google.com/intl/cs/privacy/privacy-policy.html>.
- If you want to prevent tracking, you can install an add-on to your web browser (<http://tools.google.com/dlpage/gaoptout>).

The Website may contain links to various other websites, particularly social networks such as Facebook, Twitter, Instagram, Youtube etc. These links are not part of the Website but of websites of third parties that may use cookies tracking your activities on the Internet. Third party cookies are subject to personal data protection policies of such third parties. You can block cookies in the settings of your internet browser.

Our Website also contains technical cookies that are requisite for its functioning.

Personal data security

Personal data is processed by us electronically in an automated manner or in printed form in a non-automated manner, by the staff of Senator Meetings & Incentives and the staff of authorized processors.

Personal data is stored on secure servers in IT systems and it is not, and shall not be, transferred to non-European Union countries (unless stated otherwise). We have adopted adequate technical and organisational measures

against personal data loss and destruction, against access of unauthorized persons to the data, its adjustment and dissemination. The staff has been instructed on how to handle personal data securely and discreetly and they are bound by confidentiality; in addition, each employee is acquainted with the contents of our internal personal data protection guideline. We store our documents in lockable cabinets and the entire space is protected.

Personal data recipients

We shall not disclose your personal data to any third parties, except for persons to whom we have to disclose it in order to fulfil our obligations under the contract that we conclude together (e.g. hotels, accommodation facilities, air carriers etc.) and sometimes also to persons that cooperate with us on the basis of a trade licence; these may include external IT administrators and service technicians.

For the processing of your personal data we may also use online services e.g. of Google LLC or Microsoft Corporation or e-mailing services of The Rocket Science Group, LLC (known under the trademark of MailChimp). These companies are located in the United States of America and are part of the EU-USA privacy shield (<https://www.privacyshield.gov>); such personal data disclosure therefore does not require special permission.

Access of these persons and personal data processing by a third party shall always be done under conditions stipulated by legal regulations.

Rights of data subjects

When collecting, processing and storing your personal information, we shall ensure, to the full extent, the protection of your rights as stipulated by relevant provisions of legal regulations. In connection with personal data processing, you are entitled to the below-specified rights that you may use at your discretion:

- **right of access to your personal data** – *when you may request free information on the processing of your personal data*
- **right of data portability** – *i.e. right to obtain personal data that concern you and that you have provided to us, in a structured, commonly used and machine-readable format, and the right to transmit it to another controller.*

In the case of data processing on the basis of your consent, you have the **right to partly or fully withdraw this consent** ex nunc. We shall not do any further processing without appropriate consent. You can withdraw your consent at the below-specified e-mail or postal contact addresses. The withdrawal of your consent shall not affect the legality of the data processing based on the consent given prior to its withdrawal.

If you believe or find out that the Controller or any authorized third party process your personal data inconsistently with the protection of your private and personal lives or in conflict with relevant legal regulations, particularly if your personal data is inaccurate, incomplete or processed for a given purpose without an adequate legal ground, you are entitled to request that we:

- **correct and/or complete** inaccurate or incomplete personal data related to you
- **delete** your personal data – *particularly when your personal data is no longer needed for the purposes for which it has been collected*
- **or curtail** the processing of your personal data - *particularly in situations when you contest the accuracy of your personal data, or its processing is illegal and you refuse the deletion of your personal data and instead you request its restricted use, or when we do not need your personal data for the purpose of processing any more but you request it for the determination, execution or defence of your legal claims*

In addition, you can raise an objection against personal data processing that is done on the legal grounds of a legitimate interest for reasons concerning your specific situation. In the case of such an objection, we shall cease to process your personal data unless there are justified reasons for its further processing or reasons for the proving, exercising or defending of legal claims.

Should you believe that we have breached personal data protection regulations, you are entitled to file a complaint against the processing of your personal data at the Personal Data Protection Office, address: Pplk. Sochora 27, postal code: 170 00, Prague 7, www.uoou.cz.

In connection with the enforcement of your rights and in the case of any questions or information regarding personal data handling, please contact Senator Meetings & Incentives at: info@senatortravel.eu or in writing at the following address: Senator Meetings & Incentives s.r.o., Korunní 810/104, Prague 10, 101 00, Czech Republic.

Effect and updating

This Personal Data Protection Policy is effective as of **25th May 2018**.

We review and revise our processing and personal data protection processes regularly and as a result, we may update this Personal Data Protection Policy from time to time. Should such an update include substantial changes, we shall inform you thereof. Current version of the Personal Data Protection Policy shall always be available on our Website.