

PRIVACY POLICY

This Privacy Policy specifies the personal data processed about customers by Click2Claim, s.r.o., ID No. 28791215, with the registered office at Jičínská 1748/5, Vinohrady, 130 00 Prague 3, registered in the Commercial Register of the Metropolitan Court in Prague, Section C, file 218874 (hereinafter referred to as "C2C").

This Privacy Policy is issued in accordance with 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 (hereinafter referred to as the "GDPR") in order to comply with C2C's information duty as a controller within the meaning of Articles 13 and 14 of the GDPR.

A. DATA CONTROLLER

C2C is the controller of your personal data.

B. PURPOSES AND LEGAL BASIS FOR PROCESSING

We process your personal data to secure a user-friendly internet service. The processing of personal data is necessary for the exercise of rights and obligations in connection with the provision of the services you have requested or the purchase of our products (Travel Standard, Travel Assistant) in accordance with Article 6(1)(b) of the GDPR.

Your personal data may also be used to a reasonable extent to inform you about new developments in our services in accordance with Article 6(1)(f) of the GDPR.

C. RECIPIENTS OF PERSONAL DATA

C2C is the recipient of your personal data.

Your personal data will be transferred onwards, insofar as this is strictly necessary in connection with the recovery of your claims and in connection with the performance of the services requested by you (including without limitation the transfer of personal data to the air carrier with which the claim is made).

Personal data may also be disclosed to persons who provide data processing services to C2C (IT entities, providers of the marketing platform through which newsletters and other commercial communications are sent, debt recovery lawyers, external accountants). We will vet all such persons to ensure they provide sufficient safeguards with respect to the confidentiality and protection of your personal data. We will enter into written contracts with these persons obliging them to protect your personal data and to adhere to our data security standards, as well as to maintain confidentiality.

In justified cases, personal data may also be provided to the relevant public authorities or similar institutions (e.g. tax authorities, banks, insurance companies, courts, prosecution authorities).

D. PERSONAL DATA CATEGORIES

Name, surname, date of birth, telephone number, email address, contact address, signature (on the power of attorney for recovering claims), bank account for remitting the recovered claim, information about your flight (including e.g. a copy of the ticket and similar documents).

In view of the European Commission's current communication to date to the effect that in the case of representation by an agency (i.e. C2C), the agency must – if required by the air carrier – provide a copy of your passport or ID, it is possible that, in rare cases, we may ask you to provide a copy of your passport or ID strictly for these purposes. Only the air carrier will receive this copy.

E. TRANSFERS TO NON-EU AND NON-EEA COUNTRIES

Your personal data will only be transferred to countries outside the EU and EEA if this is strictly necessary in connection with the enforcement of your claims and in connection with the performance of the services you have requested (including without limitation the transfer of personal data to the air carrier with which the claim is made).

F. DATA RETENTION PERIOD

C2C will process the personal data for the duration of the contractual relationship and for the time necessary to comply with legal obligations and defend rights arising from any disputes, but no longer than 5 years from the termination of the contractual relationship.

G. THE RIGHT TO OBJECT TO PROCESSING

If you are not interested in receiving news about our services from us and do not want us to process your personal data for this purpose, you can object to such processing at any time free of charge by sending an e-mail to: gdpr@click2claim.eu or you may unsubscribe from commercial communications sent by us as specified in any newsletter or other commercial communication you receive from us.

H. FURTHER RIGHTS RELATED TO PERSONAL DATA PROCESSING

You have the following rights in relation to the processing of your personal data:

- *Right of access to your personal data*
 - o You have the right to request information about whether your personal data are processed, for what purpose, to what extent, for how long they will be stored, the source of your personal data, whether automated decision-making, including profiling, is involved in the processing of your personal data. You also have the right to request a copy of your personal data. First copy will be provided free of charge.
- *Right to rectification of your personal data*
 - o If your personal data are inaccurate or incomplete, you can request their rectification or completion at any time.
- *Right to erasure of personal data (the so-called right to be forgotten)*
 - o If (i) your personal data are no longer necessary for the purposes for which they were processed, (ii) the processing is unlawful, (iii) you object to the processing and there are no overriding legitimate grounds for the processing, (iv) if the Controller is under a legal obligation to do so and there is no other legitimate interest of the Controller in the processing, the Controller must delete your personal data.
- *Right to restriction of processing of personal data*
 - o If any controversy arises in connection with the processing of your personal data, the controller must restrict their processing to the extent that such personal data may only be stored and, where appropriate, may be used to establish or exercise legal claims.
- *Right to object to the processing of personal data*
 - o You have the right to object to the processing of your personal data for direct marketing purposes or for legitimate interest. If processing for direct marketing purposes is objected to, personal data will no longer be processed for these purposes.
- *Right to withdraw consent to the processing of personal data*
 - o You have the right to withdraw your consent to the processing of personal data at any time. This will not affect the processing of personal data that took place before the withdrawal of consent.
- *Right to lodge a complaint with the supervisory authority*
 - o If you believe that there has been a violation of data protection rules during data processing, you have the right to lodge a complaint with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7

I. NO AUTOMATED DECISION-MAKING, PROFILING

Personal data of natural persons are not subject to any decision based solely on automated processing, including profiling, at C2C.

J. COOKIES

C2C processes personal data on www.click2claim.eu using cookies. If you visit www.click2claim.eu and allow cookies to be read, we store cookies on your device and then read them from your device. The cookies are then stored in your internet browser or on your computer's hard drive. Cookies help to identify you as you surf between pages (subpages) of www.click2claim.eu and when you return.

You can configure cookies on our website using the so-called cookie bar, which will be displayed after you visit our website.

K. PERSONAL DATA SOURCES

In the vast majority of cases, C2C obtains personal data directly from you, as a customer, in connection with your request for our services or in connection with the sale of our products ([Travel Standard](#), [Travel Assistant](#)). Should we receive your personal data from third parties (our partners), we believe in good faith that you have given your consent to such third parties to provide your personal data to C2C. If you have not given your consent, please contact us and we will address the problem.

L. PERSONAL DATA PROTECTION MEASURES

Our databases are secured against access by third parties and login data is encrypted with a strong algorithm. Our employees are not able to view your login credentials.

M. INQUIRIES

If you would like detailed information about your data protection rights, including the right of access and rectification of incorrect data, or have any other questions or complaints about the processing of your personal data, please contact us by mail at C2C's registered office address or by email at the data processing contact gdpr@click2claim.eu.