

## **Privacy policy**

The General Data Protection Regulation (GDPR) applies throughout the European Union from May 25, 2018.

The protection of your personal data is important to us, therefore we pay special attention to protecting the privacy of all those who have provided us with their data by participating in our organized campaigns, personal data senders for the processing of a request, as well as those whose personal data were provided to us by a third party, or to which we had access from another source in accordance with Parliament's Regulation (EU) 2016/679 European and Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as GDPR).

Please pay special attention to following the Policies to understand how your personal data will be processed ("personal data").

This Policy explains the practices of KONTIKI TRAVEL S.R.L. (hereinafter referred to as "KONTIKI TRAVEL"), regarding the application of the GDPR provisions, as well as the rights you receive in relation to how your information is processed by KONTIKI TRAVEL.

The processing of personal data by KONTIKI TRAVEL will always be done in accordance with the GDPR provisions, as well as with the regulations on the protection of personal data.

Through this Policy KONTIKI TRAVEL wishes to inform the data subjects about the nature of the personal data that we collect and process, as well as about the purposes of the processing. In addition, the data subjects are informed through the Policy and about their rights.

### **WHO WE ARE?**

We are KONTIKI TRAVEL, a Romanian legal entity with headquarters in Str. ALEXANDRU MORUZZI Nr. 8, Sector 3, Bucharest, Romania, registration no. J40 / 188/1997, VAT RO 5461226.

Through this Policy KONTIKI TRAVEL wishes to inform the data subjects about the nature of the personal data that we collect and process, as well as about the purposes of the processing. In addition, the data subjects are informed through the Policy and about their rights.

### **WHAT ARE THE PERSONAL DATA?**

"Personal data" means any information that can identify you directly (for example, your name) or indirectly (for example, through alias data such as a unique identification number). This means that personal data includes things like email address, home address, mobile phone, username, profile photos, personal preferences and shopping habits, user-generated content, financial information, and financial statement information. This could include unique numeric identifiers, such as your computer's IP address or MAC address of your mobile device, as well as cookies.

### **WHAT IS THE PROCESSING OF PERSONAL DATA?**

"Processing" means any operation or set of operations performed on personal data or on personal data sets with or without the use of automated means such as collecting, recording, organizing,

structuring, storing, adapting or modifying, extraction, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **WHAT ARE YOUR DATES WITH THE PERSONAL WE PROVIDE?**

Your personal data to be processed is as follows: first and last name, e-mail address, phone number, mailing address, occupation.

### **PERSONAL DATA OPERATOR**

The Personal Data Operator (hereinafter referred to as the "Operator") is KONTIKI TRAVEL

### **PRINCIPLES ON DATA PROCESSING**

KONTIKI TRAVEL undertakes to observe the principles of personal data protection (hereinafter referred to as the "Principles") provided by GDPR to ensure that all data are:

1. Prepared in a fair, legal and transparent manner;
2. Collected for specified, explicit and legitimate purposes;
3. Relevant, relevant and limited in relation to the purposes for which they are processed;
4. Correct and up-to-date;
5. Stored in a form that does not allow identification of the data subjects longer than necessary in relation to the purpose of the processing;
6. Processed in accordance with the rights of the data subject in a way that ensures adequate processing security so that the data are complete, confidential and available.

### **THEME AND PURPOSES OF PROCESSING DATA**

1. For the purpose of concluding and executing contracts - According to art. 6 par. 1 lit. b) from GDPR, personal data may be processed for the purpose of concluding or executing the contract. In order to be able to offer you our products and services, we need to process personal data that belongs to you.
2. For the purpose of fulfilling legal obligations - According to art. 6 par. 1 lit. c) from the GDPR, personal data can be processed for the purpose of fulfilling legal obligations. We request a series of personal data, including, in certain situations, the personal numeric code, in order to fulfill our obligations imposed by tax authorities on invoicing and reporting to tax authorities.
3. For marketing purposes - According to art. 6 par. 1 lit. a) GDPR may process personal data if the data subject has given his / her consent to the processing of his / her personal data for one or more specific purposes. Thus, in some situations, your personal data will be used to send you marketing messages, offers, news, future campaigns, invitations to various events.

## **PROCESSING THE CONTACT FORM**

KONTIKI TRAVEL will use the information you provide by submitting requests using the methods described in the corresponding contact section, available on the [www.lucy.ro](http://www.lucy.ro) website (by phone, fax, e-mail or mail) exclusively for the purpose of to respond to your request.

By providing any personal data through the methods described in the KONTIKI TRAVEL website, you understand and agree that your data will be processed in accordance with the provisions of the KONTIKI TRAVEL Policy.

Please be aware that in order to be able to process your requests submitted through the methods described in the site's contact section, it is possible that under certain circumstances we will be required to disclose your data to partners with whom KONTIKI TRAVEL collaborates and / or other third party service providers of KONTIKI TRAVEL.

However, KONTIKI TRAVEL has adopted appropriate technical and organizational measures to ensure the security of the data transfer, as well as processing according to the GDPR requirements of your data by the entities mentioned above.

KONTIKI TRAVEL undertakes not to process personal data provided for any purpose other than the one for which they were transmitted, except when your express consent is for use for other purposes.

It is also possible for KONTIKI TRAVEL to have access to other personal data by establishing a link with KONTIKI TRAVEL by processing the data communicated following telephone conversations, e-mail conversations, presentations at our headquarters in to obtain information, etc.

By contacting KONTIKI TRAVEL in any way specified above or any other method that implies a direct or indirect communication between you and KONTIKI TRAVEL, you understand and agree that your data will be processed in accordance with the provisions of this Policy of KONTIKI TRAVEL.

## **DIVULGATION OF PERSONAL DATA TO THIRD PARTIES**

Personal data processed by KONTIKI TRAVEL may be disclosed and / or transferred to third parties only in the case of your express consent to do so, except in situations where there is a legal / contractual obligation for KONTIKI TRAVEL de to do so.

Please note that under certain circumstances we may be required to disclose your personal data, the partners with whom KONTIKI TRAVEL collaborates and / or other third party service providers of KONTIKI TRAVEL.

## **DATA PROCESSING BY THIRD PARTY, OTHER SITES AND SPONSORS**

The KONTIKI TRAVEL website may contain access links to other sites whose data processing policies may differ from those of KONTIKI TRAVEL at any given time.

Please consider and consult the personal data protection policies of other sites, KONTIKI TRAVEL is not accepting responsibility for the information sent or collected by these third parties.

## **AUTOMATIC DATA PROCESSING. COOKIES**

The site [www.lucy.ro](http://www.lucy.ro) uses Cookie identifiers – [Cookie Policy](#)

## **DATE STORAGE PERIOD**

KONTIKI TRAVEL can store processed data for different periods of time deemed reasonable for the purposes indicated above. We keep your data only for the period necessary to achieve the purpose for which we hold the data, to meet your needs or to fulfill our obligations under the law.

To know how long your data can be stored, we use the following criteria:

1. When you purchase products and services, we retain your personal data during our contractual relationship and for a later term if there is a legal obligation to keep for KONTIKI TRAVEL;
2. If you participate in a promotional offer, we keep your personal data during the promotional offer;
3. If you contact us for a question, we will keep your personal data for as long as your questions are processed;
4. If you have given your consent to marketing, we retain your personal data until you unsubscribe or request to delete it;

## **RIGHTS OF PERSONS COVERED**

According to GDPR, you have a number of rights regarding the personal data that KONTIKI TRAVEL processes:

1. Right of access to processing data - You have the right to access our personal data. The first information will be provided without charge. If you will need copies of the information already provided, we may charge a reasonable fee, taking into account the administrative costs of providing information. Unsolicited, excessive or repeated requests may not receive a response.
2. Right to Data Rectification - You have the right to request that your Data be rectified if it is inaccurate or obsolete and / or filled in if it is incomplete.
3. Right to delete data ("the right to be forgotten") - In some cases, you have the right to obtain the deletion or destruction of your Data. This is not an absolute right, because sometimes we may be forced to keep your Data for legal or legal reasons.
4. Right to Restrict Processing - You have the right to request restriction of the processing of your Data. This means that your data processing is limited, so we can keep the Data, but not use or process it. This right applies in the specific circumstances provided by the General Data Protection Regulation, namely:
  - the accuracy of the Data is contested by the data subject (i.e. you) for a period that allows the operator (i.e. KONTIKI TRAVEL) to verify the accuracy of the Data;

- the processing is illegal and the data subject (i.e. you) opposes the deletion of the Data and requests the restriction of their use;
- the operator (for example, KONTIKI TRAVEL) no longer needs Data for processing, but they are required by the data subject (i.e. you) for the establishment, exercise or defense of legal claims;
- the person concerned (i.e. you) raised objections based on legitimate reasons on the part of the operator (in this case KONTIKI TRAVEL) to verify that the legitimate reasons of the operator (KONTIKI TRAVEL) exceed those of the data subject (i.e. you).

5. Right to Data Portability - You have the right to move, copy or transfer the data you are interested in from our database to another. This applies only to the data you have provided when processing is based on your consent or contract and is implemented by automatic means.

6. Opposition Right - You may oppose at any time the processing of your data when such processing is based on a legitimate interest.

7. Right to withdraw your consent at any time - You may withdraw your consent to the processing of your data when such processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing on the basis of consent prior to its withdrawal.

8. Right to file a complaint with the competent supervisory authority - You have the right to file a complaint with the data protection authority of your country of residence or domicile to challenge the data protection practices of KONTIKI TRAVEL.

9. Right to oppose processing of your data for direct marketing purposes - You can unsubscribe or give up our direct marketing communication at any time. It's easier to do this by clicking the "unsubscribe" link in any email or communication we send you.

10. Right to oppose the processing of your data by us when conducting actions in the public interest or in our own legitimate interests or by a third party - You may oppose at any time the processing of your data when such processing is based on an interest legitimate.

11. Right to Disable Cookies - You have the right to disable cookies. Settings in Internet browsers are usually programmed by default to accept cookies, but you can easily adjust them by changing your browser settings. Many cookies are used to increase the usability or functionality of web sites / applications; therefore, disabling cookies may prevent you from using certain parts of our sites or apps, as detailed in the relevant Cookie table. If you want to restrict or block all cookies set by our websites / applications (which may prevent you from using certain parts of the site) or any other sites / applications, you can do so through your browser settings. The Help function in your browser will tell you how. For more information, see the following links: <http://www.aboutcookies.org>;

You may exercise any of these rights with respect to the personal data that KONTIKI TRAVEL processes through a simple request to the KONTIKI TRAVEL DPO. In such a situation, it is very possible to ask for proof of your identity.

## **LEGAL REQUESTS**

We access, keep and provide your information to regulatory authorities, law enforcement or other entities:

1. In response to a legal request, when we consider in good faith that the law requires us to do so. It is also possible to respond to legal claims when we consider in good faith that the response required by law in that jurisdiction affects users in that jurisdiction and complies with internationally recognized standards.

2. When we believe in good faith it is necessary to: detect, prevent and respond to acts of fraud, unauthorized use of any material belonging to us, violations of our terms or policies, or other harmful or unlawful activities, to protect ourselves (including our rights, property or materials), yourself and others, including investigations or investigations by regulatory authorities, or to prevent imminent death or injury. For example, if relevant, we provide information to and receive information from third parties about the reliability of your account, to prevent fraud, abuse and other harmful activities within and outside of our materials.

The information we receive about you may be accessed and stored for a longer period of time when it is subject to a legal or legal claim, government inquiry, or investigation of possible violations of our terms or policies, or in other cases to prevent damage.

## **RELATIONS WITH OTHER OPERATORS**

Depending on the context, we may find ourselves in the situation of the absolute need to provide information at a higher level, both globally, internally or externally, to our partners and to those with whom we transfer GDPR data in the virtue of providing the most professional services possible. The information controlled by KONTIKI TRAVEL may be transferred, transmitted or stored and processed in the EU or in other countries than the country where you live for the purposes described in this policy. These data transfers are necessary to deliver the highest level of service and continue to deliver our materials at the best professional level.

## **SECURITY OF PROCESSING**

KONTIKI TRAVEL has adopted technical and organizational data processing measures, updated in accordance with GDPR requirements, to protect your personal data against any unauthorized access, improper use or disclosure, unauthorized modification, accidental destruction, or loss. All employees and partners of KONTIKI TRAVEL, as well as any third parties acting in the name and on behalf of KONTIKI TRAVEL, are bound to respect the confidentiality of your information and the GDPR requirements, in accordance with the Policy.

## **EXCLUSION OF LIABILITY**

The KONTIKI TRAVEL website may contain links to other sites and / or other web pages that are not owned by KONTIKI TRAVEL. KONTIKI TRAVEL assumes no responsibility for the content of these sites and therefore can not be held responsible for the content, advertising, goods, services, software, information or other materials available on or through these sites -hate. KONTIKI TRAVEL will not be responsible for the loss of personal data, any adverse effects on visitors' personal data or other

moral and / or patrimonial damage caused by access to those sites.

#### **UPDATING OF PROTECTION AND PERSONAL DATA PROCESSING POLICY UPDATE**

Please keep in mind that this Policy may be subject to periodic content changes by updating the KONTIKI TRAVEL website.

How will we let you know about the changes made to this Policy?

Should this Policy be modified, you will be able to identify the timing of the update by the date mentioned at the beginning of the Policy, under the Last Modified Paragraph; please refer to the Revised Policy before choosing to continue using our materials.

Please do not continue to use the KONTIKI TRAVEL website if you do not agree to such changes. We also recommend that you check this page for any updates.

The terms of this Policy are interpreted in accordance with the applicable law.

#### **CONTACT**

If you have any questions or concerns about the way we treat and use your personal data or you wish to exercise any of your rights, please contact us by emailing [office@lucy.ro](mailto:office@lucy.ro)