

GENERAL DATA PROTECTION REGULATION (GDPR) COMPLIANCE POLICY

1. Introduction

DESTICON s.r.o., operating under the brand Lufthansa City Center Desticon Travel (hereinafter referred to as the "Company"), is firmly committed to ensuring the highest standards of personal data protection and compliance with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "GDPR"). This policy delineates the Company's framework for the collection, processing, storage, and safeguarding of personal data. The Company is legally registered at Novodvorská 1062/12, 142 00 Praha 4, Czech Republic, and may be contacted for data protection inquiries at gdpr@lcc-desticon.com.

2. Data Controller

DESTICON s.r.o. is the designated data controller responsible for the lawful processing of personal data. Any data-related inquiries, concerns, or requests shall be submitted in writing to the above-mentioned contact details.

3. Categories of Personal Data Processed

The Company processes a wide range of personal data necessary for the provision of travel-related services, including but not limited to:

- Identification details (e.g., full name, date of birth, nationality)
- Contact details (e.g., email address, phone number, postal address)
- Financial information (e.g., credit card details, billing address)
- Travel preferences and requirements (e.g., dietary restrictions, mobility needs)
- Communication records and correspondence

4. Purpose and Legal Basis for Processing

The Company processes personal data for the following lawful purposes in compliance with Article 6 of the GDPR:

- Performance of contractual obligations for the provision of travel services;
- Compliance with legal and regulatory obligations imposed by Czech and EU law;
- Pursuance of the Company's legitimate business interests, including customer support and service enhancement;
- Processing based on the data subject's consent, specifically for marketing communications and personalized offers.

5. Data Retention

Personal data shall be retained strictly for the duration necessary to fulfill the specified purposes in compliance with legal requirements applicable in the Czech Republic. Once the retention period expires, the data shall be securely deleted or anonymized.

6. Data Sharing and Third Parties

The Company may share personal data with carefully selected third parties solely for the

fulfillment of contracted travel services, including but not limited to accommodation providers, transportation operators, and payment processors. The Company's website is hosted by WEDOS, a.s., a subsidiary of WEDOS Internet, a.s., located at Masarykova 1230, 373 41 Hluboká nad Vltavou, Czech Republic, IČ: 28115694, DIČ: CZ28115694. WEDOS, a.s. provides secure web hosting and IT infrastructure services in full compliance with GDPR requirements.

7. Data Subject Rights

Pursuant to GDPR, data subjects are granted the following rights:

- Right to access their personal data processed by the Company;
- Right to rectification of inaccurate or incomplete data;
- Right to erasure ("right to be forgotten") in legally applicable circumstances;
- Right to restriction of processing under certain conditions;
- Right to data portability to receive a copy of their data in a structured format;
- Right to object to data processing activities;
- Right to lodge a complaint with the competent data protection authority in the Czech Republic.

All requests to exercise these rights shall be submitted in writing to gdpr@lcc-desticon.com.

8. Security Measures

The Company implements robust technical and organizational measures to ensure the security, confidentiality, and integrity of personal data, including but not limited to:

- Secure servers and encrypted data transmission;
- Restricted access controls and authentication mechanisms;
- Regular security audits and compliance checks;
- Web hosting services provided by WEDOS, a.s., ensuring compliance with industry best practices and GDPR obligations;
- Utilization of secure cloud solutions, including Apple cloud and hardware protection systems.

9. International Data Transfers

The Company primarily collaborates with EU-based service providers and does not knowingly transfer personal data outside the European Economic Area (EEA). In the event that third parties transfer data beyond the EEA, the Company shall ensure that appropriate safeguards, such as Standard Contractual Clauses (SCCs), are in place in accordance with GDPR requirements.

10. Cookies and Tracking Technologies

The Company utilizes essential, functional, analytical, and marketing cookies to optimize user experience and service delivery. Cookie preferences may be managed via the cookie settings banner provided by the CookieYes plugin integrated into the Company's WordPress-based website.

11. Data Breach Notification

In the event of a personal data breach, the Company shall adhere to legal obligations under Czech law, including prompt notification to the relevant data protection authority and affected individuals where applicable.

12. Amendments to the Policy

The Company reserves the right to amend this GDPR Compliance Policy as required to reflect changes in applicable laws, regulations, or business operations. Any modifications shall be duly published on the Company's official website and shall take immediate effect upon publication.

For any inquiries, clarifications, or concerns regarding data protection and privacy, please contact the Company at gdpr@lcc-desticon.com.

Prague, January 20, 2025