

PRIVACY NOTICE

At B&A e-Travel S.A., the respect for privacy and the protection of personal data are of particular importance when planning our business policy and implementing our commercial activities. In this Privacy Policy we explain how we collect, use, transfer or otherwise process personal data in connection with our operation and commercial activities.

A. Object of our Services

Our company is exclusively dedicated to offering B2B services. Through our online Travelmaster eHotels platform (www.travelmasterhotels.com) we enable our members - users (tour operators / travel agents) to book, on behalf of their own clients, hotels and tourist accommodation, transfers and other travel services worldwide and issue the relevant vouchers. This Privacy Policy applies to the personal data collected for you, the clients, by our members - users in accordance with the Terms and Conditions of our site or the data concerning our business partners.

B. Personal data processing for the reservation of hotels, transfers and other travel services

i. Purpose and legal basis of processing

We collect the personal data in order to complete bookings of hotel rooms, transfer services and other travel services, in the name of the clients of our members – users, and to perform this service. Our members - users are the ones that collect (Data Collectors) and input the data in our online platform and thus determine the purpose of the processing, through the use of our services.

ii. What information do we need

For the reservation of hotels, transfers and other travel services, our members – users (tour operators/ travel agents) will register the following information in our platform in relation to their clients.

- Name/ Surname
- Age
- Nationality
- Country of Residence

- Title (Mr /Mrs)
- Mobile telephone number of the lead passenger (client) – only in case of transfer services.

iii. Why do we need this information

We need this information (above) in order a) to complete the reservations by our members – users of selected travel services on behalf of their clients, b) to invoice and issue the corresponding voucher and c) to cross –reference the reservation with the person (end user) that will check in to the hotel, make use of the transfer service or of any other travel service that is available for booking through our online www.travelmasterhotels.com platform. This information is also required to enable our members-users to communicate with their clients, as well as the hotels, the transfer companies and other involved parties in order to carry out the services related to the reservation made.

iv. What we do with this information

We only use the personal data of the clients of our members - users in order to apply the pricing policy, to complete reservations and to issue the relevant voucher.

v. How long do we keep this information

We retain this information for twelve (12) months from the creation date of the reservation, to be able to counteract any claims or claims for damages against us.

vi. Who can access your data

We use Sub-processors to provide our services. The Sub-processors are third party companies – our suppliers of hotel services, transfer services and other travel services.

The Sub-processors have come to agreement with our company:

- to maintain confidentiality
- to take all appropriate security measures
- to comply with the legal framework for the protection of personal data and in particular the GDPR.

In the case of Sub-processors operating outside the European Union, we take the appropriate measures to ensure a similar level of protection either by: (a) transferring the data to countries that are considered by the European Union to provide an adequate level of protection, or b) using contractual terms approved by the European Commission, which provide the same protection for personal data, or (c) in the case of US-based Sub-processors, have been certified with Privacy Shield.

If you require additional information, you may contact us at gdpr@travelmasterhotels.com

C. Communication with B&A

Purpose and legal basis of processing

Whenever you contact us for general enquiries about our company or our products and services, we keep the information you provide us with in order to respond to your requests.

We also keep names and contact details of the clients of our members - users with whom we come into contact when they encounter problems with the travel services booked through our platform by their travel agents. Such contact details are given to us by our member-users.

The legal basis for processing is Article 6 (1) (f) of GDPR, ie the legitimate interest of our company.

How long do we keep the information you provide us?

The information we keep regarding general enquiries about our company and its products is deleted six months following your last communication with us.

As long as we communicate with clients of our members-users in case of an emergency (indicatively when they encounter problems with reservations), then we keep the data for five (5) years so that we can counteract any claims or claims for damages against us.

D. Processing of our members-users data

The following data protection notes apply to you, if you contact us, if contract negotiations are taking place with us and / or contractual agreements exist with us and the personal data of subjects are processed in that sense.

Purpose and legal basis of processing

The purposes of personal data processing arise from the execution of pre-contractual measures that precede a contractually regulated business relationship and the performance of the obligations of a contract (Article 6 (1) (b) of the GDPR).

What information do we need

To begin with, you personally submit the data to us.

The following are considered to be personal data: Personal information (e.g., name, surname, address and other contact information), data within the context of our business relationship (e.g., payment data, orders data), corporate data, as well as data similar to those mentioned above.

How long do we keep the information

Tax related information and documents will be retained by our company for a period of twelve (12) years for tax audit purposes.

Who can access your data

Your information, which is necessary for submitting tax and insurance data, as well as for making payments, is sent to our affiliated accountancy office. It is possible that the information necessary to claim compensation or to counteract your claims will be sent to our legal department.

E. Automated data collection

Purpose and legal basis of processing

When accessing our platform, they are automatically sent from the terminal browser you use and without your own action:

- The IP address of the device with online access that submitted the request,

- The date and time of access,
- The name and URL of the requested file,
- the web site / application from which access was made (referrer-URL),
- the browser you are using, the operating system of your computer that has online access, and the name of the access provider, to the server of our website and are temporarily stored in a log file **for the following purposes:**
- Good connection creation guarantee,
- Guarantee of easy use of our website / application,
- Evaluation of the platform's security and stability.

The legal basis for the **processing of the IP address** is Article 6 (1) (b) of the GDPR, namely for the execution of the contract between us, since the access to our platform is only allowed to the customers - users of our services.

How long do we keep this information

The above data is kept for five years in order to be able to check the compliance with our contractual commitments.

Who has access to your data

As a rule, we exclude the transmission of this data to third parties.

Cookies – General suggestions

On our platform we use cookies based on Article 6 (1) (c) of the GDPR. Our interest in optimizing our platform must be considered legal, within the meaning of the aforementioned provision.

You'll find a summary of the cookies used with additional information (e.g., about storage duration) and the ability to oppose our Cookies Policy [here](#).

F. Submission of an application – CV for a work placement

Purpose and legal basis of processing

The purpose of processing the information we collect is to examine your suitability for the position that is being advertised.

The legal basis for processing is Article 6 (1) (b) of the GDPR related to the necessary processing for the performance of a contract or for action to be taken on your request prior to the conclusion of a contract.

Why do we need this information

We will use the information you provide to us to examine your application for a work placement. We will not pass on the information you give us to third parties for commercial purposes.

We will use the contact information to communicate with you and the additional information to assess your suitability for the work placement.

We do not request for more information than we need and we do not keep them for a longer period than necessary.

The information we ask each time concerns your suitability for the particular work placement.

- Application procedure

In this process, we need your personal information, such as your name and contact details. We also need previous experience and studies on a case by case basis.

- Selection process

Personnel Selection Officers will examine your applications and invite you to an interview, in order to select the right person for the work placement. Applicants will not be evaluated on the basis of their public profile on social media, at any stage of the selection process.

- Offering - accepting a work placement

If you choose to accept the work offered, we will ask for additional information in order to recruit you.

This information will be only the essential one needed to fill in your data in the ERGANIS system of the Ministry of Labor, Social Security and Social Solidarity, i.e. name, surname, maiden name, date of birth, ID number, VAT number, DOI, AMKA , Social Security number, home address, email, marital status, bank account number, salary amount. In addition and depending on the placement offered, we will ask you to provide us with a copy of your ID or passport, certificates of studies and foreign languages.

How long do we keep this information

Applications, resumes and information sent to us that are immediately discarded will be deleted - destroyed within one month of filling the advertised work placement.

Applications, biographies and information sent to us for evaluation will be deleted - destroyed within six months of filling the advertised work placement.

In the event of recruitment of the employee, all information relating to him/her, including the payment of remuneration and the reasons for terminating his/her contract, will be deleted after twenty (20) years from the end of the employment relationship.

Supporting documents for maternity leave and sick leave will be deleted after five (5) years from the end of the year they have been received.

Who has access to your data?

Your information, which is necessary for submitting tax and insurance data, as well as for payment of remuneration, is sent to our affiliate accountancy office and possibly to our legal department.

In addition, we cooperate with the National Bank of Greece for the payment of our employees' salaries.

G. Activity

Our headquarters and our servers are located in Greece, so all information is filled and stored within the European Union.

H. What are your rights?

You have the **right to access** your personal data. This means you have the right to be informed by us if we process your data. If we process your data, you can ask for information about the purpose of the processing, the type of data we keep, who we give it to, how long we store it, whether automated decision making is applied, but also your additional rights, such as correction and deletion of your data, limiting the processing and submitting a complaint to the Data Protection Authority.

You have the **right to correct** inaccurate personal data. If you find that your data is wrong, you can submit us an application apply to correct it (e.g. name correction).

You have the **right to delete / the right to be forgotten**. You may ask us to delete your data if it is no longer necessary for the above-mentioned processing purposes.

However, it may not be possible to fulfill this right if:

- There is a pending dispute or litigation with our company or one of our customers – travel agents.
- The purchase you have made for the provision of a service has not yet taken place.
- You have debts to one of our customers – travel agents and/ or us.
- If your data concerns tax information, which we have to keep for twelve (12) years.

You have the **right to transfer** your data. Under certain conditions, you may ask us to receive in a readable form the data you have provided or ask us to forward it to another processor.

You have the **right to restrict** the processing. You can ask us to restrict the processing of your data for as long as your processing objection is pending.

You have a **right to oppose** processing your data. You may oppose the processing of your data or remove your consent and we will stop processing your data unless there are other compelling and legitimate reasons that prevail over your right.

I. How can you exercise your rights?

In order to exercise your rights, you can send us a request, describing the right you wish to exercise either on the postal address of the company (26 Vouliagmenis Avenue, 11743 Athens) or at gdpr@travelmasterhotels.com, with a description of your request and we will make sure to examine your request and respond to you as soon as possible.

J. When do we respond to your requests?

We will respond to your requests free of charge, without delay, and in any case within (1) one month from the day we receive your request. However, if your

request is complicated or there are a large number of your requests, we will inform you within one month if we need to take another two (2) months extension within which we will respond to you.

If your claims are manifestly unfounded or excessive due in particular to their recurrence, our company may charge a reasonable fee, taking into account the administrative costs of providing the information or executing the requested action or refusing to follow up request.

JA. Where can you address the progress of your requests?

For more information, please contact us at +30 210 9240780 or at the e-mail address (gdpr@travelmasterhotels.com) using the title: "Request Progress".

JB. Do we use automated decision making/ including profile creation, when processing your data?

No, we do not make decisions, nor do we create profiles, based on automated processing of your data.

JC. What is the applicable law when we process your data?

We process your Data in accordance with the General Personal Data Protection Regulation 2016/679 / EU and in general the current national and European legal and regulatory framework for the protection of personal data.

JD. Where can you appeal if we violate the applicable law on the protection of Personal Data?

You have the right to file a complaint with the Personal Data Protection Authority (1-3 Kifissias Avenue, Athens / www.dpa.gr), if you believe that processing of your Personal Data violates the applicable national and regulatory framework for the protection of personal data.