

# Customers personal data protection (Privacy Policy)

## Information on personal data processing

The company INFOBUS s.r.o., having its legal address at Pod Harfou Str. 938/42, Vysocany, ZIP 190 00, Prague9, Reg. No.: 242 45 224, takes the protection of personal data provided us by You with all due gravity. It is important for You to know, that all personal data provided by You, are processed to in a highest responsible and transparent manner, so that You are entitled to request the information about the stored personal data, its correction or erase, if such data are provided upon Your expressive consent. In case of any questions regarding processing of Your personal data You may turn to our company or to the belowstated representative on personal data protection. Any correspondence regarding the abovementioned should be sent in written to legal addresses of our company or our representative.

## Personal data processing

The company INFOBUS s.r.o. processes personal data solely upon reasons stipulated in the prospective valid legal regulations. The process of personal data processing shall commence upon fulfillment of any of legitimate reasons, which are: consent with personal data processing, fulfillment of contractual obligations, fulfillment of administrator's legal obligations, legitimate interests of the administrator.

### **The company INFOBUS s.r.o. processes the following personal data:**

**identification data**, which are name and last name, username and password, number and validity term of travel document, date of birth, nationality and personal ID;

**contact data**, which are personal data that allow to contact you, namely email address, phone number, residence address and your social network contact;

**your settings**, which are data in your account, namely saved address and newsletter settings;

**data on your orders**, which include namely information on the services you've ordered, your payments, including your payment account number and claim details; information about your loyalty cards (if any);

**your health information**, which include namely information about health restrictions related to the use of our services, such as a health handicap or pregnancy;

**biometric data** in a form of your dynamic biometric signature;

**information from your rating of our services**, which are information stipulated in the review of the transfer (or other services provided) on our website, and your photo attached thereto;

**information about your behavior on the website, including** viewing it through our mobile application, in particular goods and services that you view, the links you click, a way of browsing our website and scrolling screens and details of the device from which you viewing our website, such as the IP address and derived location, the device identification, its technical parameters as the operating system and its version, the screen resolution, the browser used and its version, as well as data obtained from cookies and similar device identification technologies;

**information about your behavior during reading of messages** sent by us, in particular time of opening and details of the device from which you viewing our website, such as the IP address and derived location, the device identification, its technical parameters as the operating system and its version, the screen resolution, the browser used and its version, as well as data obtained from cookies and similar technologies;

**derived data**, which means personal data derived from your settings, data about the services you order from us, information about your behavior on the web, and information about your behavior during reading of messages sent to you; in particular, your gender, age, financial situation, purchasing behavior and relationship to different services;

**data regarding the contact of call centrum or visit of our office**, which are namely records of phone communication with the call center, identification of messages sent us by you including identifiers, such as IP addresses and recordings from the surveillance systems in our offices

What processing we can do without your consent depends on the purpose of the processing and your position - whether you are just a visitor of our website, or will you register with us or create an order. If you are a passenger or participant in another service ordered by us, we can process your data, if you communicate with us or visit our office.

## **1. If You Visit Our Website**

### **1.1 Use of Cookies and Other Technologies**

If you visit our website, we store and read cookie files from your device. Cookie is a small file containing numbers and letters, which is stored in your browser or hard disk of your PC. Some cookies allow us to link your activities while browsing our site, from the moment you open the browser window until you close it. When you close your browser's window, these cookies will be deleted. Others remain in the device for a set amount of time, and are activated each time you visit the website that generated the cookie. Moreover, we use pixel marks (aka "web beacons"), which are small pictures, which have similar function as cookies. Compared to cookies that are stored on your PC's hard disk, pixel tags are a solid part of the website. All of these technologies described herein will be further mentioned as cookies for the sake of simplicity. Not only we store cookies in your device, but we also read the cookies stored by our website. To make it easy, we will talk only about storage in this document.

Some cookies are stored in your device directly by our web. These cookies help us to:

- identify you during navigation between individual pages of our website and on repeated visits, such as remembering your login from a particular device and not to ask you to email and password repeatedly, or to save which version of our website you want us to view, if the website offers more variations at a given moment;
- acknowledge that you have granted us consent under this document, or, for example, if you offered your participation in a survey;
- provide security (e.g. to research, if your connection to our website is not misused, and no one acts instead of you);
- record, study and troubleshoot failures on our website.
- track the traffic of our web and its single pages, create statistics and overviews, as well as measure advertisement effectively;
- show you different variations of our website in case we test new features;

These cookies and other files are necessary for functioning of our website. If you block these cookies, our website

Further,

- we store our website cookies into your device, that help us to
- customize our website content, e.g. to display the shown products and customized offers on our website;
- help third parties to store cookies, which can use them
- for collection of data about your behavior on our website and other pages;
- in order to display customized offers and targeted ads within advertising and social networks on the websites other than ours;
- to connect with social networks such as Facebook, including auto login, providing features such as the "Like" button, or viewing customized offers and targeted ads on these social networks and websites other than ours.

In order to display customized offers and targeted ads within advertising and social networks on the websites other than ours, we also provide advertising and social networks with information about your web website behavior.

If you do not disable the use of third-party cookies and the transmission of your data to the advertising and social networks in the Privacy Settings section and clicked anywhere on our website (outside the alert panel) or clicking on the "I agree" button in our notification, we consider you agree with the use of these cookies and transmission of your information to the advertising and social networking. You can revoke your consent at any time by turning off this feature in the Privacy Settings section.

### **1.1 Use of Website Visitors' Personal Data**

If you visit our website, we process your **website behavior data** basing upon our legitimate interest (i.e. without your consent) in order to:

- obtaining information that will help us improve our services in the future; our legitimate interest in this case is to improve our services for you;
- creation of statistics and reports, especially tracking our website traffic and its pages and measuring ad performance; our legitimate interest in this case is measuring our website's efficiency and advertising costs. For this purpose we may obtain additional **derived data** from your web website behavior and use it for that purpose;
- testing of new features and applications before implementation, in particular to avoid problems with the functionality of these innovations in real-life operation that could aggravate your ordering experience with us. Our legitimate interest in this case is the seamless functionality of our services for you
- preventing attacks on our website, that endanger its functionality and the security of your data; our legitimate interest is the seamless functionality of our services for you and the security of your data.

Your behavior data aren't obtained solely from the cookies. We also add the following data:

- IP address of your device (address of your device, which helps you to communicate with other devices on the internet);
- the operating system of your device, its version and language settings;
- the browser installed your device, its version and language settings;
- URL, that leads you to our website.

We use these personal data for these purposes not longer than for 38 months. You have **the right to claim** against such processing.

We also process **data about your behavior on web website upon your consent** to the **registration of your account or the transfer of your personal information** upon purchase of our services, in order to create customized offers and targeted ads which will be displayed on the website. Our legitimate interest is the most personalized and effective offer for you. We also enrich the data for this purpose by analyzing and obtaining the **derived data**. According to this data, we also divide our users into different groups, where each group receives their own specific offer. If you subsequently order something from us, we also use **your orders data** for these purposes.

Therefore, if you have viewed an offer of a line or any other different service, we may display this link or service on the first page of our site upon your next visit. Basing upon what kind of line you've been looking at, we can also judge what group of customers you belong to, and accordingly, provide you with possible interesting additional services on the website or by e-mail.

For these purposes we use the personal data for 2 years.

## **2. If you register**

In order you can register, you must visit our website, that's why you are subject to the processing procedures described in the **"If You Visit Our Website"**. In case you register, we carry out the following additional processing:

### ***2.1.Processing upon fulfillment of contract***

If you create an account on our website, we process your **identification and contact details, your settings, information about your orders** (if you later order a service from us), upon fulfillment of contract (without your consent) for us to manage your account. The contract, that our processing relies on, is executed upon creation of your account.

For these purposes we use the personal data for the entire term of your account validity. Except when we need to process and protect your data under the law (for example, in the accounting system).

### ***2.2. Processing upon legitimate interest***

If you create an account on our website, we process your **identification and contact details, your settings, information about your orders** (if you later order a service from us), **your behavior on the website and behavior during reading of messages** upon your consent. This is carried out for the purpose of:

- obtaining information that will help us improve our services in the future, in particular, ascertaining your satisfaction with our services; our legitimate interest here is to improve our services for you and
- by offering customized offers and targeted ads that we can **send it** by email, text, social, communicate by phone or other electronic means, mail them or **view** them on our website; these offers may concern both our products and services and third-party products and services; our legitimate interest is the effective promotion of our products and services.

In order we can prepare a customized offer, we analyze the abovementioned data and we obtain additional **derived data** used for that purpose. Thus, we can also use information about your behavior on the website, acquired before your registration, and we may collect information about your behavior on the website even if you don't register (e.g. identification through cookies). According to this data, we also divide our users into different groups, where each group receives their own specific offer.

In case you have viewed the link on our website or clicked on it in the email we sent you, we can show you this link on the first page of our website on the next visit or send you an offer for this link

by email , what kind of connection you've been looking at, we can also judge what group of customers you belong to, and accordingly, provide you with additional services on the Web or by e-mail that you might be interested in.

In order to create customized offers and targeted ads displayed on the website, as it's described in "**If You Visit Our Website**", we will use also the data about your orders (if you order our services).

Basing on our legitimate interest (i.e. without your consent), we will also use **your settings** to test new features and applications before implementation, as it's described in "**If You Visit Our Website**".

For these purposes we use the personal data for the entire term of your account validity. You have **the right to claim** against such processing.

### ***2.3 Processing upon consent***

If you create a carrier review on your website on our website, we process your **identification data and data from your review of our offered services, including the attached photos**, also based on your consent to processing to share information about your satisfaction with the services offered with other visitors to our website. We use personal data for this purpose, until you cancel your consent with the processing.

### **3. If you order from us**

In case this order (or demand) is created through our website, you are subjected to processing described in "**If You Visit Our Website**". In case you create an order, we carry out the following additional processing:

#### ***3.1 Processing upon fulfillment of contract***

If you create an order acting as a natural person, **we process your personal data to handle your order, namely your identification and contact data** and your order details.

If you buy from us being a representative of legal entity, we process the same data for the same purpose upon **our legitimate interest**, which is conclusion and fulfillment of the contract with the person you represent.

Your data will be used to handle your order, which means we will use namely the following:

- in order you can finish your web order, e.g. to prevent the loss of data entered into the unfinished order.
- so we can communicate with you about your order, e.g. to send you a confirmation;
- to pay for goods and services. In this relation we may transfer your data to our partners, who are operators of the payment systems, as it's described in **Who Processes Your Personal Data And Whom Are They Transferred To?**;
- to pay for goods and services. In this relation we may transfer your data to our partners, who are operators of the payment systems, as it's described in **Who Processes Your Personal Data And Whom Are They Transferred To?**;
- in relation with your other requests, if you submit us them via the call center, as described in **If You Communicate With Us Through Different Channels**.

For these purposes we use the personal data for the term necessary to handle your order or such contractual request as claim.

#### ***3.2 Processing upon legitimate interest***

If you make a binding order with us, we will keep your **identification and contact details, as well as your order details** based on our legitimate interest (e.g. without your consent) in order to protect

our legal claims and keep our internal records and control. In this case, our legitimate interests are the protection of legal claims and the control of the proper provision of our services. In this context, we may also process your **biometric data** if you sign a contract via signpad at our office.

If you make an order, we will process your identification and contact details (in case you have an account by us) upon our legitimate interest (e.g. without your consent), as well as your order details for the following purpose:

- obtaining information that will help us improve our services in the future, in particular, ascertaining your satisfaction with our services; our legitimate interest here is to improve our services for you and
- by offering customized offers and targeted ads, which can be **sent** by email, text, social, communicate by phone or other electronic means or mail them; our legitimate interest is the effective promotion of our products and services. In order we can prepare a customized offer, we analyze the abovementioned data (i.e. your identification and contact details and your order details) and we obtain additional **derived data** for that purpose. According to this data, we also divide our users into different groups, where each group receives their own specific offer. If you do not register with us, we do not use data about your website behavior to prepare the offers we can address you.

If you have ordered a ticket or service from us, we can contact you with a targeted offer of related services. Basing upon your order, we can also judge what group of customers you belong to, and accordingly, provide you with services offer. If you do not have any account, we will not customize the offers based on what you viewed on our website or which links were opened in your newsletter.

In order to protect our legal claims and our internal records and controls, for the duration of the limitation period (3 years) and one year after its expiration with respect to the claims enforced at the end of the limitation period. In the event of initiation of legal, administrative or other proceedings, we process your personal data to the extent necessary for the duration of such proceedings and the remainder of the limitation period after its termination.

For the other purposes, we use personal data for 3 years from the date of the order.

You have **the right to claim** against the processing upon our legitimate interest.

### ***3.3 Processing upon fulfillment of legal obligations***

We must fulfill our legal obligations as well. If we process your personal data just for this reason, we do not need to obtain your consent for such processing. Based on this legal basis, we process your **identification and contact details, ordering information**, in particular to comply with the following laws:

- of the Act No. 89/2012 Coll., the Civil Code,
- of the Act No. 634/1992 Coll., the Act on Consumer Protection,
- of the Act No. 235/2004 Coll., the Act on Value Added Tax,
- of the Act No. 563/1991 Coll., the Act on Bookkeeping,

For these purposes we use the personal data for 10 years.

### ***3.4 Processing upon consent***

If you grant us your consent when ordering a service, **to handle your order** we may also process the following:

- your health information, so that we can record your health restrictions while traveling and ensure, that these limitations are respected upon provision of our services; such consent must be explicit;
- your personal ID number to identify you in necessary cases, otherwise we cannot ensure the order for you without your consent;

- your personal ID number to ensure your employer's contribution, if such is provided through us.

We use the personal data for the term necessary to handle your order or such contractual request as claim, or until the revocation of your consent. In selected cases, we may retain your data even after revocation of your consent, if this is necessary to protect our legal claims. Then such data shall be kept during the term stipulated in the **"Processing upon legitimate interest"**.

#### **4. If you order an insurance from us**

If you order an insurance from us, we will act as an **administrator** in processing of your identification data and the data about your order, **just to handle your order**. As a **processor** we may obtain your personal ID number for the insurance agency. We transfer these data to the insurance agency, as it's described in **Who Processes Your Personal Data And Whom Are They Transferred To?**;

#### **5. If you are a passenger or participant in another service ordered by us**

If you are a passenger or participant in another service ordered by us, we process the following **identification and contact data**:

- a) upon our legitimate interest for the execution of our client's order. This order execution is also our legitimate interest;
- b) upon our legitimate interest to obtain the information that will help us improve our services in the future, or information for our statistics and overviews; our legitimate interest in this case is to improve our services for our customers;
- c) in order to fulfill the legal obligations under the Act No. 235/2004 Coll., the Act on Value Added Tax, and the Act No. 563/1991, the Act on Bookkeeping;
- d) upon our legitimate interest in order to protect our legal claims and keep our internal records and control; in this case, our legitimate interests are the protection of legal claims and the control of the proper provision of our services.
- e) with your consent, it is necessary to process the personal ID number or your health status; such consent may be also granted on your behalf by the person making an order with us;

We use personal data to prepare, conclude, and perform the contract with our customer for the period necessary to complete the order. After this time, we retain the data upon our legitimate interest in order to protect our legal claims and our internal records and controls, for the duration of the limitation period (3 years) and one year after its expiration with respect to the claims enforced at the end of the limitation period. In the event of initiation of legal, administrative or other proceedings, we process your personal data to the extent necessary for the duration of such proceedings and the remainder of the limitation period after its termination. In this case, our legitimate interests are the protection of legal claims and the control of the proper provision of our services. For the purposes of fulfillment of legal obligation we use the personal data for 10 years.

You have **the right to claim** against the processing upon legitimate interest.

#### **6. If You Communicate With Us Through Different Channels**

If you communicate with us through different channels, especially through the call center, e-mail, chat, and social networking, we will process your **identification and contact data, as well as call records**, on our legitimate interest (without your consent) for the purpose of:

- 6.1.** processing your requests; if you have created an order and your request relates to it, we can process it upon fulfillment of contractual obligation;
- 6.2.** documenting your requirements so that we can check that we do it properly and in a timely manner;

**6.3.** Demonstrating that we have accepted and handled your request, for example, when you order something from us or file us a claim;

**6.4.** their analyses for improvement of our services.

For these purposes we store the personal data for 1 year from termination of mediated services provision. You have **the right to claim** against the processing upon legitimate interest.

#### **7. *If You Subscribe To Our Newsletter***

If you subscribe to our newsletter, we will process **your contact data or your settings** upon your consent with the processing, for the purpose of **sending of our offers**. We use personal data for this purpose, until you revoke your consent with the processing (i.e. unsubscribe from the newsletter).

#### **8. *If You Visit Our Office***

If you visit our branch, we will process the **recording** from the **surveillance system** where you may be captured, based on our legitimate interest (i.e. without your consent) in order to protect our and your property and persons moving in and around the office, which is at the same time our legitimate interest.

For these purposes we store the personal data for 7 days maximum.

### **WHAT ARE OUR SOURCES OF PERSONAL DATA?**

In most cases, we process personal information you provide upon your order of services, creation and use of an account, or communication with us (e.g., with a call center). We also get personal data from you by monitoring your behavior on our website and reading messages, recording your calls at the call center, and surveillance camera records. Your personal data can be obtained as well from the third party (e.g. when it orders a ticket or other service).

If you order something from us, we may receive **additional information about your orders** from banks, our partners running payment systems and ensuring installments sales, such as your account number or successful payment, all this within the fulfillment of the concluded purchase agreement.

## **Securing Your personal data**

The company INFOBUS s.r.o. takes the protection of personal data provided us by You with all due gravity. We have taken the appropriate technical and organizational measures to protect your data sufficiently with respect to the seriousness of its processing. No unauthorized person shall access Your personal data stored by us, neither Your data shall be transferred to any subject for further processing without Your consent, unless required by the law or protection of our legitimate interests.

### **Who Processes Your Personal Data And Whom Are They Transferred To?**

We process your personal data as an **administrator** in cases described in **Why Do We Process Personal Data And What Entitles Us To Do So?** This means we determine the abovementioned purposes, for which we collect your personal data, identify the processing means, and respond for their proper execution.

We may transfer your personal data to other subjects, who are in the role of the **administrator**, which are:

- in relation with handling of your order to our partners involved in this performance, as listed in the section **If You Order Something**, namely,



- partners, which ensure for us bus and railroad transfer of passengers (transporters and sellers of bus and train tickets)
- partners, which operate the payment systems to secure the payment, namely in connection with the payment card, namely to the following companies: **Global Payments s.r.o.**, Reg. No. 270889, **PayU S.A.** having its legal address at Grunwaldzka Str. 182, 60-166 Poznań, Poland; **Česká Spořitelna**, Reg. No. 45244782, having its legal address at Olbrachtova Str. 1929/62, ZIP 140 00, Praha 4; **Fio Banka**, Reg. No. 61858374 having its legal address at V Celnici Str. 1028/10 Praha 1, ZIP 110 00; **ING Bank Śląski S.A.**, Reg. No.: 634-013-54-75, having its legal address at Sokolska Str. 34, ZIP 40-086 Katowice; **PayPal Inc**, The Services are offered by PayPal Pte. Ltd., located at 5 Temasek Boulevard #09-01, Suntec Tower Five, Singapore 038985; **Sberbank**, Reg. No.: 250 83325, having its legal address at U Trezorky Str. 921/2, ZIP 158 00, Prague 5, 15000; **Yandex**, Reg. No.: 7736207543, Moscow, Lva Tolstogo Str. 16, ZIP 119034, **AO “KIWI Bank”**, Reg. No.: 3123011520, Moscow, mkr. Chertanovo Severnoe, 1A, korp.1; **PAO «Sberbank Rossiyskoy Federatsii»** division in Smolensk, No. 8609, Reg. No. 7707083893, Smolensk, Im. Polka Normandia-Neman Str. 23, ZIP 214 025; System **LiqPay**, **PAO KB “PRIVATBANK”**, 01001, Ukraine, Kiev, Grushevskeho Str. 1D, Reg. No.: 14360570; System **EasyPay**, **OOO “FK“KONTRAKTOVIY DOM”** 08135, Ukraine, Kyjev district, village Chajky, Valentyny Chaiky Str., 16, Reg. No.: 35442539; **AO “Ukrssibbank”**: 04070, Ukraine, Kiev, Andreyevska Str. 2/12, Reg. No.: 09807750; **OOO FK “WAY FOR PAY”**, 69037, Ukraine, Zaporozhye, Nezavysimij Ukrajinij Str., 39-A, office no. 27, Reg. No.: 39626179; **PAO KB “PRIVATBANK”**, 01001, Ukraine, Kyev, Grushevskeho 1D Str., Reg. No.: 14360570
- travel agencies and other third parties that provide additional services to your order, your order, if it is necessary to process your order (if we are not acting as a third-party processor) or if you are claiming our brokerage services and handling your complaint, or other third parties;
- partners, which ensure for us reservation of air tickets in the international reservation systems, namely the Tickets UA company, Reg. No.: 36027535, Lvov, Zelenaya Str. 44-B;
- to insurance agencies, if you order an insurance from us **MAXIMA pojišťovna, a.s.**, Reg. No.: 61328464, Italská Str. 1583/24, ZIP 120 00, Prague 2 - Vinohrady.
- upon your consent to advertising and social networks, as described in the **“Use of Cookies and Other Technologies, Transmission of Data to Advertising and Social Networks**, specifically:
  - **Seznam.cz**, a.s., Reg. No. 26168685;
  - **Google Ireland Limited** (Reg. No.: 368047), having its legal address at Gordon House, Barrow Street, Dublin 4, Ireland. Privacy terms available at: <https://policies.google.com/technologies/ads>
  - **Facebook Ireland Limited**, having its legal address at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02 X525, Ireland. Privacy terms available at: <https://cs-cz.facebook.com/about/privacy>

- **Vkontakte** or **VK.com** having its legal address at Saint-Petersburg, Khersonskaya Str. 12-14, lit.A, pom.1N. Privacy terms available at: <https://vk.com/privacy/eu>
- **Odnoklassniki.com** or **Ok.com**, having its legal address at Moscow, pr-kt.Leningradskiy Str, 39, office 79, ZIP 125167. Privacy terms available at: <https://ok.ru/privacy>
- Telegram.org (**TELEGRAM MESSENGER LLP**) having its legal address at **71-75 Shelton Street, Covent Garden, London, WC2H 9JQ** Privacy terms available at: <https://telegram.org/privacy>
- **Viber Media S.à r.l.** Privacy terms available at: <https://www.viber.com/terms/>
- **Twitter** Privacy terms available at: <https://twitter.com/en/privacy>
- **Instagram**. Privacy terms available at: <https://instagram-together.com/safety/>
- **WhatsApp Ireland Limited** Privacy terms available at: <https://www.whatsapp.com/legal/#privacy-policy>

For the processing of personal data we also use the services of other processors who process personal data only under our instructions and for the purposes described in **Why Do We Process Personal Data And What Entitles Us To Do So?** Such **processors** are:

1. our franchises that ensure operation of our branches;
2. our trade representatives who ensure the sale of services
3. providers of cloud services and other providers of technologies and support, such as Microsoft and Google;
4. operators of marketing tools such as Google within Google Analytics and HotJar (HotJar Ltd, based in 3 Elia Zammit Street, St. Julians STJ 1000, Malta) to help us optimize the website and personalize the content and offers for you;
5. operators of marketing tools such as Google within Google Adwords, which helps us personalize the content and offers for you;
6. operators of marketing tools such as Yandex within Yandex Direct service (Moscow, Lva Tolstogo Str. 16, ZIP 119034), which helps us personalize the content and offers for you;
7. operators of marketing tools such as Seznam within Sklik service, which helps us personalize the content and offers for you;
8. providers of instruments for administration and recording of phone calls, namely 3CX, Russian Federation, Avrora Business Center, Sadovnicheskaya St. 82/2, Moscow.
9. providers of SMS communication and chat tools in case they process personal data to mediate our communication with you: OOO «СМС Трафик», Reg. No.: 1057746117384, Reg. No.: 7705642257, Reg. No.: 774301001, Russian Federation, Moscow, Leningradsky prospekt Str. 80, office 37, ZIP 125 190;

providers of bookkeeping services, namely **Pohoda**, Reg. No. 2531314, having its legal address at: Za Prachárnou Str. 4962/45, ZIP 586 01, Jihlava; **1C**, OOO “**Tekhnocentr Mayak IT**”, 79000, Ukraine, Lvov, Sakharova Str. 43, office 207, Reg. No.: 40920500

In some cases we process your personal data as an **administrator**, if:

1. we sign a contract with you on behalf of a carrier, or with we handle a claim with you on behalf of a carrier;
2. we sign a contract with you on behalf of a travel agency, or with we handle a claim with you on behalf of a travel agency;
3. we enter into a contract with you on behalf of a third party, which provides additional services to your ticket or air ticket or other service, or we handle a complaint with you on behalf of such third party;
4. for MAXIMA insurance agencies;

## **DATA TRANSFER OUTSIDE THE EU**

As part of the data transfer to our processors listed in "**Who processes your personal data and to whom we forward it?**", we may also transmit your data to third countries outside the European Economic Area, which, nevertheless, provide an adequate level of personal data protection.

## **Right for information**

You are entitled to request INFOBUS s.r.o. to provide You with information, which personal data do we process, to which extent and for what purpose they are processed, which external company processes them and which additional rights regarding processing of your personal data do you have. Everything is available in the document named "Customers personal data protection". However, if you are unsure which of your personal data do we process, you may ask us to confirm whether your personal data are processed by us or not, and, if so, you have the right to access these personal data. As a right of access, you can ask for a copy of the processed personal data, whereas the first copy is provided free of charge and additional copies with a charge. Such information can be provided free of charge not later than within 30 days, in extraordinary cases not later than within 90 days. In extraordinary cases we will inform you in advance, if the deadline is extended. In case You will request the information we have about You, first of all, we have to verify, that You are the person whom such information is pertaining to. Please provide sufficient identification of Your person in the application. If needed, we are entitled to ask You about additional info for verification, before we can provide You with Your personal data that are processed by us.

We are also entitled to reject requests for information which are unreasonable, inappropriate, or are unreasonably repeating, or if such information can be obtained unreasonably difficultly (typically from backup systems, archives, etc.).

## **Data update, right for correction**

Regarding the fact, that personal data can be changed from time to time (e.g. change of last name), we will be glad, if You inform us about any such change, therefore we shall have all actual information about You to avoid potential errors. Provision of information about the change of personal data is highly important for us to fulfill our obligations of the administrator.

This is also related to Your right for correction of Your personal data, stored by us. If You find out that our data are no longer up to date, You can apply for their correction.

## **Right to limit the processing**

- In some cases you may, in addition to the right of cancellation, exercise the right to limit the processing of personal data. In certain cases this right allows you to require your personal

data to be tagged, and exclude these data from any further processing operations - in this case this is not forever (as in the case of a right of cancellation), but for a limited time. Personal data processing may be restricted if:

- you deny the accuracy of personal data before agreeing which data is correct;
- we process your personal data without a sufficient legal basis (e.g., beyond we need to process), but you will only prefer to restrict such data before their deletion (e.g., if you expect us to provide such data in the future);
- we don't need your personal data for the abovementioned purpose of processing, but you request them for specification, performance or defense of your legal claims, or
- file a claim against the processing. The right to object is more elaborately described further in the **Objections**. Within the entire term of examination, if your objection is justified, we are obliged to limit the processing of your personal data.

## **Right for transfer**

You are entitled to obtain from us all your personal data provided to us, which we process upon your consent and the fulfillment of the contract. Your personal data will be provided in a structured, standardly used and machine-readable format. In order to easily transfer the data upon your request, it can only be data that are processed automatically in our electronic databases.

## **Objections**

In case You believe we do not process Your personal data in accordance with valid legislation of the Czech Republic and the European Union, You are entitled to file an objection, we will subsequently verify the validity of Your request. We hereby inform You, that You are entitled to object against the processed personal data, that are processed to the prospective supervising office for personal data protection, having its address at:

### **The Office for Personal Data Protection**

**Pplk. Sochora Str. 27**

**ZIP 170 00, Prague 7**

## **Right of erasure**

If You have previously provided Your consent with processing of Your personal data, You are entitled to revoke it at any time. In such case we are obliged to erase the personal data processed solely upon Your consent. Right of erasure does not apply to the data processed under performance of contractual obligations, legitimate reasons or interests. If any of Your data are stored in the backup systems, which automatically ensure durability of all of our systems and work as a protective element against data loss in cases of emergency, we are not capable to erase such data from these backup systems as well. Sometimes it is technically impossible. Nevertheless, such data are not actively processed and are not subjected to further processing purposes.

In some cases you have the right to erase your data. This application must be filed in a way that allows the applicant to be accurately identified. Your personal data will be deleted without any delay, in case any of the following occurs:

- we don't need your personal data for the purposes they were processed.
- you revoke your consent to the processing of your personal data, whereas your consent is necessary to process them, and, at the same time, we have no other reason why we need to process these data further;

- use your right to object the processing (see the **Right To Object To Processing**) of the personal data process by us upon our legitimate interests, and we find that no legitimate interests justify such processing are, or
- you think, that our personal data processing ceased to be in compliance with legal regulations.

But please remember, that if one of these reasons is fulfilled, it does not mean that we will immediately delete all your personal data. This right does not apply, if the processing of your personal data is still necessary to fulfill our legal obligation or to determine, enforce or defend our legal rights (see “**Why do we process personal information and what entitles us to do so?**”).

## **Right to file a complaint**

By exercising your rights in the abovementioned manner, your right to file a complaint with the relevant supervisory authority remains unaffected. You may exercise this right namely if you believe that we process your personal data unjustifiably or in contrary to the generally binding legal regulations. You may file a complaint against our processing of personal data to the Personal Data Protection Office, located at Pplk. Sochora 27, ZIP 170 00, Prague 7.

## **Whom you can turn to**

In all matters regarding protection of Your personal data You can turn directly to our representative for personal data protection by email:

[gdpr@bussystem.eu](mailto:gdpr@bussystem.eu)

or:

**INFOBUS s.r.o.**

Pod Harfou Str. 938/42

190 00, Prague 9

Actual contact data are available at [www.infobus.eu](http://www.infobus.eu)

Your request shall be resolved without undue delay, but not later than within one month. In exceptional cases, especially due to the complexity of your request, we are entitled to extend this period by another two months. Surely we will inform you on this possible extension and its justification.

## **Representative for Personal Data Protection**

In addition to the Customer Care Center, our **Data Protection Officer** is ready to assist you in all matters regarding the processing of your personal data. The Delegate can be contacted at the following email address: [gdpr@bussystem.eu](mailto:gdpr@bussystem.eu)

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or:

**NDPO services s.r.o.**

Ludvika Kuny Str. 866

ZIP 27204, Kladno