

## **Data protection information in accordance with Art. 13 and 14 of the EU General Data Protection Regulation (EU-GDPR).**

With this privacy policy, we inform you about the processing of your personal data by us as well as about the rights you are entitled to when using our services as an agency.

### **1. Who is responsible for data processing and whom can you contact?**

The entity responsible for data processing is DTS INCOMING HELLAS TOURISTIC SERVICES SOCIETE ANONYME, Kazantzidi Avenue and Vosporou 13, N. Alikarnassos, Herakleion, Crete, Greece. If you have any questions about data protection, you can contact the following e-mail address: [dpo.dtshellas@dtsservices.travel](mailto:dpo.dtshellas@dtsservices.travel).

### **2. What data and what sources do we use?**

We process data that we receive in the course of processing the contractual relationship between you and the organizer. We receive the data from the tour operator based on your travel booking or, if applicable, directly from you, e.g. in the context of an excursion or a hotel booking.

If you transmit personal data of other persons (e.g. fellow travelers) to us, you must ensure that they agree and that you are allowed to transmit the data. You must ensure that these persons know how their personal data can be processed by us and what rights they have.

To the extent necessary, we process the following categories of data for the performance of our services:

- Master data for the performance and fulfillment of the travel service. (e.g. title, name, gender, date of birth or age of all travelers customer/transaction number);
- Customer requests, which may include health data (e.g., physical impairments or food intolerances) for the provision of mobility assistance/optional services
- Legitimation data for VISA applications (e.g., data from the identity card)
- Data in connection with payment processing and, where applicable, as security for the deposit of services in the case of purchases made directly from us (e.g. bank data, credit card data)
- Communication data (e.g. correspondence or e-mail correspondence with you)

### **3. On what legal basis and for what purpose is your data used?**

3.1 To carry out pre-contractual measures and fulfill contractual obligations (Art. 6 para. 1 lit. b EU-GDPR).

We process your data for the performance of our contracts with you, i.e. in particular for the implementation and processing of the booked travel services. The purposes of the data processing depend in detail on the specific travel services and the contract documents (e.g., transfer, rental car, excursions).

3.2 For the protection of legitimate interests (Art. 6 para. 1 lit. f EU-GDPR).

In the context of a balance of interests, to protect legitimate interests, your data may be used by us or by authorized third parties according to the relevant contractual terms. This is done for the following purposes:

- Assertion of legal claims and defense in legal disputes
- Prevention and investigation of criminal offences by public authorities
- Processing of inquiries and provision of necessary information in the context of conforming with our legal responsibilities.
- Ensuring IT security and availability of IT operations.

Our interest in the respective processing results from the respective purposes and is otherwise of an economic nature (efficient task fulfillment, sales, avoidance of legal risks).

To the extent permitted by the specific purpose, we process your data pseudonymously or anonymously.

### 3.3 Based on your consent (Art. 6 para. 1 lit. a EU-GDPR).

If you have given us consent to process your personal data, this respective consent is the legal basis for the processing mentioned therein. In particular, you may have consented to being contacted by e-mail, telephone or messenger service. You can revoke your consent at any time with effect for the future. To do so, please contact us at our contact address. The revocation is only effective for future processing, not for processing that has already taken place.

### 3.4 Due to legal requirements (Art. 6 para. 1 lit. c EU-GDPR).

We are subject to various legal obligations and statutory requirements (. The purposes of the processing include identity and age verification, fraud prevention, the fulfillment of tax control and reporting obligations and the assessment and management of risks. We state that in these cases, our entity doesn't proceed to automated processing or profiling.

### 3.5 Data processing for the protection of vital interests (Art. 6 para. 1 lit. d EU-GDPR).

We process your data in individual cases to protect your vital interests, e.g., in order to be able to provide emergency response teams with an evacuation list in emergency situations. The data will be deleted after the required retention periods have expired.

## 4. Who gets my data?

Your personal data will only be disclosed in compliance with the requirements of the EU-GDPR and only to the extent permitted by a legal basis. Your data will be disclosed only to those entities that need it to fulfill our contractual and legal obligations or to perform their respective tasks, e.g.

- Internal offices entrusted with the execution of the trip/processing of your inquiry
- Print service providers (printing and dispatch of customer documents)
- Transport service providers (bus companies)
- Accommodation providers (hotel management)
- Service providers of other booked services In addition, the following entities may receive your data:

- Order processors used by us (Art. 28 EU-GDPR), in particular in the area of IT services, logistics and printing services, who process your data for us in accordance with your instructions
- public bodies and institutions (tax authorities, embassies of the destination country) in the event of a legal or official obligation (retention obligations, VISA procurement, obtaining entry requirements) as well as
- other bodies for which you have given us your consent to transfer data.

## **5. How long will my personal data be stored?**

To the extent necessary, we process your personal data for the duration of our business relationship, which includes the initiation and execution of a contract. In addition, we are subject to various storage and documentation obligations, which arise, among other things, from national regulations in the country of travel.

Retention period up to 10 years is applicable.

## **6. Will my data be transferred to a third country?**

We transmit your data to recipients outside the scope of the regulation of the EU-GDPR only insofar as this is necessary for the execution and processing of the travel services or is required by law or you have given us your consent (e.g. long-distance travel). This data processing is a permissible exception from Art. 49 EU-GDPR.

Insofar as a third country transfer takes place when using processors, this is secured, among other things, with EU standard contractual clauses in accordance with Art. 46 Para. 2 lit. c EU-GDPR. If necessary, the EU standard contractual clauses are supplemented by further contractual assurances.

Do I have certain rights in the handling of my data?

You have the right to information (Art. 15 EU-GDPR), to correction (Art. 16 EU-GDPR), to deletion (Art. 17 EU-GDPR), to restriction of processing (Art. 18 EU-GDPR) and to data portability (Art. 20 EU-GDPR) under the respective legal conditions.

In addition, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Art. 6(1)(f) EU-GDPR, in accordance with Art. 21 EU-GDPR. This also applies to so-called "profiling" based on this provision within the meaning of Art. 4 No. 4 EU-GDPR. If a justified objection is made, we will no longer process this personal data for these purposes. An objection can be made form-free to our contact address. In addition, you have a right of appeal to a data protection supervisory authority (Art. 77 EU-GDPR).

<https://www.dpa.gr/> all information is valid as of February 2022, subject to change.

You can find further information on <https://gdpr.eu/>

#### **8. Is there an obligation for me to provide my data?**

Within the scope of our business relationship, you only have to provide the personal data that is required for the establishment, execution and termination of a business relationship or that we are legally obligated to collect. Without this data, we will usually have to refuse to conclude the contract or execute the order, or we will no longer be able to execute an existing contract and may have to terminate it.

#### **9. Is there automated decision-making in individual cases?**

For the establishment and implementation of the business relationship, we generally do not use automated decision-making pursuant to Art. 22 EU-GDPR. Should we use these procedures in individual cases, you will be informed about this separately if this is required by law.

#### **10. Will my data be used in any way for profiling?**

We do not process your personal data for profiling.

#### **11. Contact details of the data protection officer**

If you have any questions regarding data protection, please contact:

Data Protection Officer:

Elina Papadaki

*Kazantzidi & Vosporou 13  
71601 Nea Alikarnassos  
Heraklion - Greece*

*t : +30 2810 335500*

*f: +30 2810 22 46 01*

[dpo.dtshellasi@dtservices.travel](mailto:dpo.dtshellasi@dtservices.travel)