

CONFIDENTIALITY STATEMENT

ALFA TRAVEL D.O.O

General legal requirements

Alfa travel d.o.o holds your privacy in high regard which is why we take special care to keep your personal information fully protected.

In order to better inform you of the ways we keep your personal data protected, we bring to your attention this confidentiality statement. We hereby want to elaborate the purpose for collecting your personal data and information, what exactly constitutes said personal information, why and how we collect them and ultimately how we process your collected personal data.

Any and all personal data collected is processed, only, for the purposes of providing quality service. All data is therefore collected and processed in a legal and fair manner, with full transparency, consent and in agreement with our clients. We only process the data necessary for providing our services while keeping your confidentiality and protecting your data.

Abovementioned personal data primarily refers to natural person, entity or branch with whom we have a business relationship or interest to establish future contact like our clients, suppliers, business partners and employees.

All personal data, which provides your identification, is kept only for the duration of the processing phase in order to provide agreed upon services unless the law binds us and legal acts require us to do otherwise. In which case we are duty bound to act according to our legal obligations.

When the need for processing your information has ended, any and all personal data previously collected will be deleted, or made anonymous for the purposes of statistical analysis, thus ensuring your full privacy and protection.

We gather and process personal data in accordance to our values and principles, as well as, via confidentiality agreement, in concordance to active European and Croatian legal acts regarding personal data privacy, all the while having the interest of our clients as our primary focus.

This confidentiality statement applies equally on personal data in digital, or electronical form, as it does for personal data in printed or paper form.

Expressions used in this confidentiality statement that bear gender meaning equally apply on both male and female gender.

Principles of personal data processing

In processing personal data, we primarily follow the principles and rules established by REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) in effect since 27th of April 2016.

When analysing personal we data, we also keep in mind the obligation to keep the secrets of the trade in a way that is regulated by the laws of European Union and the Republic of Croatia.

Any and all personal data collected we process: legally, fairly and transparently; in specific and exactly regulated legal purposes using only accurate, up to date, appropriate and relevant data limited only to the purposes of the said data analysis; data is kept and processed only for the duration until fulfilling the purposes of the data analysis during which the data is protected from tampering by any unauthorized or unlawful entity, as well as, accidental loss, damage or disintegration. Personal data of minors (under 16 years old) we process only according to legal or contractual privilege or in line with explicit consent given by their parents or guardians. The data is therefore processed only in the extent the consent is given. We protect the children's rights and their interests in particular.

Confidentiality and security

Rest assured we approach to all your personal data with confidentiality, keeping your personal data secure and protected. We never perform unauthorized data processing or use your personal information in any unauthorized way.

In the event of including potential new technologies for the purposes of data analysis, we perform risk analysis protocol beforehand in order to ensure the complete safety of your data.

We use adequate measures of organisational and technical protection and support in order to fully minimize the risk to your personal data. Such measures are as follows - strong passwords on computers and mobile phones that are changed regularly and not shared with third parties, as well as, scheduled updates of personal information. If the personal data is no longer needed or the data is not up to date, and without the ability to be updated, then we either delete the data for good or make the data anonymous.

We take special care not to reveal or enable privity to your personal data and information, we have access to, to any unauthorized people, branch or entity.

Storing data

ALFA TRAVEL d.o.o. is concerned with the proper manner of storing data, regardless of paper, digital, electronical or any other form it can take.

Personal data that given on paper we keep in a locked drawer or file cabinet that can only be accessed by authorized personal. We take special care to protect your data from being accessed by unauthorized people.

Personal data given in digital, or electronical form, is protected from unauthorized access, accidental changes or deletion - in other words – the data is protected from unauthorized breach of system due to proper technical and organizational support and protection. We take care to use only credible and screened media for storing information, as well as, servers or cloud server that applies their own valid security methods.

Your personal data won't be stored directly into mobile phones unless such data is necessary for carrying out the contract or carrying out the service we agreed upon. However, such data is only kept during the time the contract is valid and only in the extent covered by the agreement.

Personal data analysis and processing

All personal data is analysed and processed in a legal manner, in line with requirements, principles and standards expressed in GDPR directive and combined with national legislations.

The analysis is based on carrying out the contract agreement and owing up to our legal obligation towards our clients. We don't use automated data analysis, including making a profile, in order to make a decision which could create legal effect towards our participants or in a similar way might influence the participants and realisation of their rights.

We take care to collect all personal data, whenever possible, directly from the subject this data refers to. While collecting said data, participants are always informed of the reason and the purpose for their data to be analysed, as well as, the legal basis for such analysis to be carried out in the first place.

During every personal information and data transfer we use adequate protective measures. These measures correspond to categories of said personal data, and the risk which accompanies such classification, all the while taking care of peculiarities of each and every case of data transfer.

Your data is transferred only to our screened contracted partners for the purposes of realising the rights and interests of our clients, as well as, realising the contract relationship. We inform our participants and clients about this data transfer, however, we also make a point to emphasize that all personal data is to be kept private and will not be released to third parties without participants/client's exact request or clear permission; or in case when it is needed to do so for the purposes of gaining agreed upon services.

Exceptional circumstances in which we can divulge your personal data to international and state institution or public body is if it is needed to fulfil some legal obligation or is in service of protecting your life interest, or life interests of other people.

Equally so, upon the request of judicial apparatus such as the court or other authorized state body in service of legal action (regardless of the phase of that legal action), or some other action carried out by appointed authorized body, we are in position to reveal your personal data in both range and boundaries the warrant for your data extends to.

Information system for tourist check in and check out eVisitor

eVisitor is an online informational system that connects all tourist communities and agencies in the Republic of Croatia. The system offers insight into the state of tourist traffic, updated database on accommodation capacities and objects and those who offer accommodation services, as well as, tax control for tourist residence tax.

Our partners use eVisitor system to check in and check out clients in accordance to valid laws in the Republic of Croatia. This is the reason why we collect the following personal information from our clients: name and surname, address, date and year of birth, place of birth, citizenship and finally identification number of the document and the type of identification document.

After all data is inputted in eVisitor system you can contact eVisitor to realise your rights in reference to personal data that is being processed.

Efficiency assessment for data protection

In case we assess the possibility of certain type of data processing and analysis to create potential high risk to individual rights and freedom, especially while using or implementing new technologies, and bearing in mind the nature, range, context and the purpose for said data analysis then before proceeding with the data processing we perform efficiency assessment for personal data protection.

When performing efficiency assessment in theory it contains methodical description envisaged steps of analysis in relation to the purpose of analysis, risk assessment for the rights and freedoms as well as measures for dealing with the risks and authentication according to General data protection regulation.

International transfer of personal data and information

As a rule, we don't perform transfer of personal information to third parties or international organisations (international transfer).

Exceptions to this rule, when we do transfer personal information to countries that are not a part of the European Union or to some international organisation can be based upon:

- that country or organisation is on the list of countries and international organisations that provide adequate level of protection, in accord to publicly stated rule of European commission;
- using expected and adequate security measures such as binding cooperative rules, instruments of public authority, approved code of conduct together with binding obligations of chief analyst or executive of data analysis in third country referring to consistent application of appropriate security measures;

- Existence of adequate institutionalised legal protection for the participants in third countries.

Any type of legal verdict carried out by courts or governing bodies of third countries which require personal international data transfer or the reveal of your personal data, does not bind us to divulge such data, nor shall we act upon such verdict. Only in the case such verdict is rooted in international accord that requires from the Republic of Croatia to honour such agreements e.g. agreement on mutual legal support and help. In all other cases we will keep your privacy and will not reveal your personal data.

Accuracy and update of personal information

In order to ensure accuracy and continuous update of personal information and data, that data will be stored only in places where it is absolutely necessary. Using good examples, we will make possible to our participants to keep their information up to date in a simple and accessible manner.

If, however, during personal data analysis and processing phase, or while testing the data given, we can conclude that the data we have is not accurate or up to date, without the ability to update or the update itself is possible but at the great cost and effort, such data will be deleted.

Establishing your rights as a participant

Establishing rights as a participant is of great importance to us. Each application for establishing rights as a participant, we handle with professionalism, keeping the standards of General Data Protection Regulation and principles on which, this confidentiality statement is based upon.

Overview of your rights in this privacy statement is simplified in order to achieve better understanding and grasp of the statement.

General Data Protection Regulation and national legislation go further in detail and structure of the complex procedure to gain and establish your rights. Which is why we suggest for you to get better acquainted with the laws and procedures that give you more insight into description of your rights and ways you can achieve them.

You have a right to receive feedback information about the status of your data processing and analysis- is it under process or not. If your personal information and data is currently processing, you can ask for access to your personal data along explanation of the purpose for the analysis, category of your personal data and what the data is exactly as well as any recipient for your personal data.

You have a right to ask for correction or deletion of your personal data or limitation of personal data analysis, as well as, the right to transfer personal data.

Your request to gain abovementioned rights is filed and sent via electronic mail to this address:

E-mail): _____info@alfatravel.hr_____

To your request we will respond in the shortest amount of time possible, where the deadline should not exceed 30 days. During this process we will take steps to undoubtedly confirm the identity of the persona filling the request before giving any information regarding personal data.

All information regarding the ways of gaining your rights is given in electronic form and are free.

In case you ask for copies of such information or you send repeated request about achieving your rights, in other words if it is clearly a case of unsubstantiated and exaggerated claims, we keep the right to charge you for administrative expenses your action will cause.

In case the analysis of your personal data is rooted in your consent, at any time you can easily and transparently withdraw your consent and ask for us to stop any further data analysis.

Along with that you can also ask for any and all your personal data to be deleted without any further due if the data is no longer need for the purposes for which they were being collected or the data is to be deleted to honour regulations of the European Union and the Republic of Croatia.

Protocol in case there is personal data violation

In case there is a violation of personal data and in particular unauthorized breach into information system, we will notably inform the Agency for personal data protection within 72 hours' time and in accordance to our internal protocols.

If the damage of personal data can cause high risk for individual rights and freedoms, we will without any due immediately inform the participants whose data has been violated.

Closing statement

If for any reason you feel like we don't treat your personal data adequately or we don't conduct ourselves according to General Data Protection Regulation directive you have the right to contact the Agency for personal data protection.

This confidentiality statement will be updated as deemed necessary, at least once a year, each time keeping track of good examples of other practices and news from the arena of data privacy and protection and in agreement and per advice of clerks and officials for data protection.