

Data Protection Policy

As a part of our business the company collects and processes personal information for the purposes described in the Data Protection Policy. The company is responsible for processing data relating to your personal data for these purposes.

For us, responsible treatment of the personal data collected as part of the operation of our business is crucial to both our business aims and our reputation. In this Data Protection Policy we will explain how your personal information is collected and used when you are one of our customers, suppliers or partners, and how you can gain insight into your own information.

If you have any questions about our Data Protection Policy or of our treatment of your personal information, you can contact us here:

Assisto

ul. Ogórkowa 51c

04-998 Warsaw, Poland

e-mail: assisto@assisto.pl

1. What Are Personal Information?

Personal Information is any data about an identified or identifiable physical person. By identifiable physical person we mean a person who can be identified directly or indirectly by data such as an ID number or one or more elements that are specific to a given person's identity.

2. Why Types of Personal Information do We Collect and Why?

The information we collect about you will be used for various purposes in connection with our customer relationship with you and the planning and arranging of the tour you booked with us. The information gathered may vary according to whether you are a customer, supplier or partner, but generally speaking it will include information concerning customer administration, supplier administration and information concerning our rights and obligations.

The failure to provide relevant personal information on your behalf may mean that we will be unable to fulfil our obligations to both you as a customer or as a supplier.

As a rule we only collect and processes standard personal information. However in certain situations, such as in the case of booking a tour with us, it may be necessary for us to, in a limited degree, deal with sensitive personal information (for example, information on special dietary requirements when booking special meals, or information about your needs for special assistance on your journey), as well as information about your ID number (for example in connection with obtaining a copy of your passport details for hotel booking or for a hunting licence) in order be able to deliver the tour you booked to you.

Typically Assisto will collect information about your: Passport, Hunting License, EU weapons passport, Weapons Permit.

3. Information About Our Customers

Information that you give us when booking a tour with us, for example online via our website or when you contact one of our members of staff, including Contact Details (Forename(s), Surname,

Address, Telephone Number, E-mail address and poss. Job Title), CPR (ID) number (for visa applications etc.), Passport Number, Weapon Passport Number, Driving License Number, Bank Details, Credit Card Details, information you give us about your special preferences regarding the tour (eg. special dietary requirements, special assistance requirements because of disability or illness etc.), health information (details of height, weight, clothes and shoe size (for ordering equipment to be used during your tour)), the purpose of your journey, details of which languages you speak, citizenship, bonus card numbers, memberships of our partners clubs, contact details for your next of kin, information about your communication and marketing preferences, as well as the information you may give us with regard to a question or when reporting a complaint or otherwise contact us in connection with your customer relationship with us.

Additionally we may access information about your credit worthiness from the applicable credit agencies for the purpose of assessing your financial status and creditworthiness relating to our customer relationship with you.

4. What Do We Use Your Personal Information For

We use your personal information for the purposes listed below. Please note that not all of the stated purposes, information categories, information recipients or types of process will apply to your information in all cases.

We only use your personal information when it is absolutely necessary for your relationship with the company (taking into consideration the interests involved with each individual case) or in accordance with applicable legal requirements.

5. Customer Administration

We use your personal information in connection with the creation and ongoing administration of your customer relationship with us and to complete the booking of your trip, including the booking of transport and of our other products and services (such as newsletters, visa applications, travel insurance, transfer services etc.), maintenance of our customer records, billing, debt collection, marketing, statistics etc. All statistics and other analysis are carried out in an anonymous format, and therefore do not contain any information that can be directly attributed to you as an individual person.

6. The Legal Basis For Processing Your Personal Information

Basically we use information about you for one of the following reasons: (1) Your Consent (GDPR article 6, section 1, point a, and article 9 section 2 point a) (2) the execution or completion of your contract with us (GDPR article 6, section 1, point b) (3) the consideration of the company's legitimate interests, ie. the purposes described above (GDPR article 6, section 1, point f) (4) the fulfilment of our legal obligations (GDPR article 6, section 1, point c) (5) the protection of your or another parties' interests (GDPR article 6, section 1, point d, and article 9 section 2 point c) (6) processing necessary in order for a legal claim to be established, enforced or defended (GDPR article 9, section 2, point f) and/or (7) processing that is necessary to comply with our or your labour, health and social legal obligations under National or EU law. Additionally it may be necessary to use your personal information for the sake of a third parties' legitimate interests with regard to the purposes described above, unless your interests carry more weight (GDPR article 9, section 2, point b)

Additionally situations may arise where we might process your personal details for the legitimate interests of a third party, such as those described above, unless your interests are deemed

weightier (GDPR article 6, section1, point f).

7. Sharing Personal Information

We only disclose personal information to the extent absolutely necessary for the operation of our business, including in connection in supplying you with the tour you booked or with other products you have purchased from us.

We will typically pass on personal information to the following recipients when booking travel and related products:

7.1 Hotels

We pass on personal details to the hotels that you will use on your tour. For the purpose of booking your accommodation we will typically provide the hotel with the following information: forename(s), surname, dates of arrival and departure, room category, bonus card number, any special requests for your stay, such as arranging special meals or any special assistance you may require during your stay at the hotel due to disability or illness.

7.2 Car Hire Companies

We pass on personal details to Car Hire Companies if you require a vehicle during your tour. For the purpose of booking a hire car we will typically supply the following information: forename(s), surname, pickup location, rental period, vehicle category, driving licence information, bonus card number, special requirements in connection with hiring a vehicle, such as special needs related to disability or illness, child seats etc.

We use the following Car Hire firms: [Europcar, Hertz, Avis].

7.3 Bus Companies

We pass on personal details to Bus Companies, if you need to travel by bus as part of your tour. For the purpose of booking bus transport we will typically supply the following information: forename(s), surname, pickup location, date and time of your bus journey, and any special requirements you may have in connection with your bus journey, such as special meals, or extra assistance needed on your journey because of handicap or illness.

7.4 Insurance Companies

As a part of booking your trip with us you will have the opportunity to purchase a travel and/or insurance policy. If you wish to purchase an insurance policy we will disclose your personal information to the insurance company for the purpose of arranging the policy. This information will typically include your forename(s), surname, e-mail address, destination, dates of your outward and return journeys and the type of tour you have booked.

We work with the following Insurance Company as part of our business activities: PZU

7.5 Equipment Hire Companies

As a part of booking your trip with us you will have the opportunity of hiring equipment that you may need for your tour, for example weapons or similar items. If you wish to hire any equipment we will pass on your personal details to our partners at your destination, who will provide the

equipment hire. For the purpose of hiring equipment we will typically provide the following information: forename(s), surname, type of equipment, hunting license, time of collection and the length of hire period.

8. Data Integrity and Security

Personal data is not stored for any longer than is necessary to fulfil the purposes for which they were collected, unless their storage is required to comply with national legal requirements, such as statutory storage periods in connecting with accounting procedures etc.

It is the company's policy to protect your personal data by taking adequate technical and organisational security measure. When your personal information is no longer required, we ensure that it is deleted in a safe and responsible manner.

9. Your Rights

You can at any time exercise your rights under current data protection legislation. You may, for example, request an insight into what personal information we hold on you, as well as object to the way we process that information, including objecting to automated treatments and profiling, or against the use of your personal data for direct marketing. Additionally you may request that any incorrect information about yourself is corrected or deleted, withdraw your consent to use or data, and apply your right to be forgotten.

If you wish to apply one or more of your rights listed above, please contact us at assisto@assisto.pl. Your request will be processed in accordance with the data protection legislation currently in force.

Complaints about Assisto use of your personal data should be made to:

Assisto

ul.Ogórkowa 51c

04-998 Warsaw, Poland

10. Updates

We regularly review and update this Data Protection Policy. You should therefore check our Data Protection Policy regularly to see if any changes affect how we process your personal information.