

PERSONAL DATA PROCESSING & PROTECTION INFORMATION

Introductory information

Eclair s.r.o., with its registered address at Dědinská 893/29, Ruzyně, 161 00 Prague 6, Reg. No. (IČO): 242 75 255, registered in the Commercial Register administered by the Prague Municipal Court, Section C, File 2712 (“Eclair” or the “Administrator”), acting as the Personal Data Administrator in connection with the provision of services and operation of the <https://www.eclair.aero> website, processes personal data of natural persons, particularly its customers and website visitors (“Data Subjects” or “You”).

The safety of your personal data and confidential use thereof are important to us, and we therefore approach personal data processing with maximum responsibility, using modern safety standards. Towards this end, we handle your personal data that you have provided to us and that we have collected about you in a confidential and responsible manner. The purpose of this document is to provide you, a data subject, with information that primarily involves the following:

- What type of personal data Eclair processes and for what purposes;
- How Eclair processes personal data;
- With whom Eclair shares personal data;
- Your rights in relation to processed personal data and to Eclair.

To get more information about matters regarding personal data processing & protection, you can contact Eclair by sending an email at GDPR@eclair.aero, calling +420 233 311 711 or sending a registered letter to the address of the Company’s head office.

Personal data and how they are obtained

The term “personal data processing” refers to any operation or series of operations with personal data or personal data files that are performed by means of automated processes or without the use of automated processes, such as gathering, entering, arranging, structuring, saving, editing or altering, looking up (searching), inspecting, using, disclosing by transmitting, disseminating or making available in any other form, organising or combining, restricting, deleting or destroying.

Personal data processing is necessary in interactions and negotiations concerning contractual arrangements, in meeting obligations that arise from such contractual arrangements, in meeting obligations arising from legislation, as well as in identifying data subjects. When executing a contract or providing a service, some personal data need to be provided to Eclair as the Personal Data Administrator - concluding or continuing such a contractual arrangement (or providing the respective service) is not possible without providing the required personal data.

Eclair does not use profiling and automated processing for automated decision-making that has legal effects on you or involves you substantially.

Personal data include identification data of natural persons such as: name, address, telephone number or date of birth, as well as e.g. IP address and other location data obtained through website visits. Whenever you visit our website, the system automatically collects information about the website use, and our website server saves data for the purpose of statistical investigations as well as to ensure system safety and stability. As you enter our website, your

internet browser automatically provides data to our website server, primarily the access date and time, the URL of the linking website, the file browsed, the volume of data transmitted, the type and version of your browser, the operating system and your IP address. These data are saved separately from the other data that you enter in the course of using our website. Matching the aforesaid data with any particular person is not possible.

In addition to the above, we only collect and process personal data that you share with us or, as the case may be, that we receive from the business partner through which you have made an inquiry about services provided by us. The purpose of such processing is always predefined, i.e. personal data are never processed for purposes other than those for which they have been obtained.

Eclair also obtains personal data by means of electronic forms available on its website, always to the extent of the form concerned (contact form, flight inquiry form, job vacancy form).

For the purpose of providing its services, Eclair processes your identification data, such as: first name and surname, date of birth and passport No. If the character of the service requested by you so requires, Eclair also processes some other personal data, such as, in particular: payment card No., ID copies or, as the case may require, important information about your health condition that we, as an air transport company, have to know.

Personal data of clients that Eclair makes contracts with will be stored until the end of the business arrangement concerned or until the expiry of the respective warranty, limitation and archiving periods. In addition to the above, such data will also be stored until the completion of legal disputes and similar proceedings, if any, in which such data may be used as evidence.

For the purpose of processing your queries or comments made on our website or by e-mail, personal data provided by you are processed over the period of handling your query or comment concerned.

Further, Eclair is entitled to process personal data under individual personal data processing consents, in which case Eclair processes personal data for purposes specified individually in each such consent form and over a period specified therein or until such consent is revoked.

Personal data sharing

Eclair may share personal data with third parties (personal data recipients) under conditions laid down by legislation, particularly in cases where such sharing is necessary for meeting rights and obligations arising from agreements made with data subjects. If necessary for performing an agreement, i.e. for providing agreed services, Eclair sends personal data also to countries outside the European Union; the data subject is always informed timely.

Under an authorisation granted by Eclair, personal data may be processed by personal data processors in the Czech Republic and abroad. Personal data may be shared, to the necessary extent, with providers of transport and logistics services, IT services, or providers of postal and delivery services.

Cookies and plug-ins

To individualise and optimise the customer experience and make the operation and the browsing of its website user-friendly, Eclair uses “cookies”. Cookie is a term used for information sent by a web server to a browser and resent back by the browser when the web server is revisited in the future. Cookies include information e.g. about visits made to the server so far or offers that the user checked out in the past.

The key purpose of cookies is to design an offering that exactly meets the needs of the user concerned while ensuring that the use of the offered services is as comfortable as possible. Cookies are not used to launch applications or to transmit viruses to user computers.

Eclair currently uses exclusively “session [GDPR_Informacni_povinnost_web_ENG.pdf](#)cookies”, i.e. cookies that are not saved on the user’s hard disk and are deleted upon closing the browser.

You can reject the saving of cookies at any time, usually by selecting the respective option in the browser settings or using some additional applications. For more details see the Help chapter of your browser. A no-cookies feature may reduce the range of services offered by us while negatively affecting the use of our website.

Eclair uses the following third-party tools on its website: Google Analytics, Google AdWords and Seznam Sklik.

Links to other websites

Our website includes links to other websites. The exclusive objective of such links is to provide you with information, and since we do not administer the linked websites, they are not subject to this personal data processing & protection information.

The responsibility for processing and protecting personal data as well as for the content of any linked website lies exclusively with their respective operators. If you click on some of these links, the operator of the respective website may start collecting your personal data and process them in compliance with their own personal data processing & protection rules that, however, may be different from these (Eclair) rules.

Personal data security

The objective of the technical and organisational security measures used by us is to protect data that you provide to us against unauthorised handling, whether inadvertently or intentionally, loss, destruction or access by unauthorised persons. Eclair keeps developing and enhancing its security measures in line with ongoing technological developments.

Your rights in connection with the processing of your personal data

Each personal data subject whose personal data are processed by Eclair is entitled to:

- Access their personal data - based on the right of access to personal data, Eclair will provide information about the purposes of personal data processing, about the categories of processed personal data and their recipients, about planned personal data storage periods and about other rights that the data subject may exercise in connection with the processing of their personal data;
- Personal data correction - based on the right to rectification, Eclair will correct, without undue delay, inaccurate personal data;

- Personal data erasure - based on the right to be forgotten, Eclair will erase identified personal data; however, Eclair will not erase personal data if the processing thereof is based on a valid legal right, in particular if such data are necessary for determining, exercising or defending Eclair's legal claims;
- Restriction of personal data processing - based on the right to restriction of personal data processing, Eclair may restrict the processing of identified personal data; over the period of restricted personal data processing, Eclair will be entitled to process the personal data concerned, subject to consent from the respective data subject, for the purpose of determining, exercising or defending Eclair's legal claims or in order to protect the rights of some other party;
- Personal data portability, i.e. transferability to a different administrator, if technically feasible;
- Revoke their consent to the processing of personal data at any time, including the right to ensure that their personal data are erased or anonymised without undue delay if there is no other legal reason for their processing – once the personal data processing consent has been revoked, Eclair will not be entitled to use personal data for the purposes specified in the revoked consent.

Further, each data subject whose personal data are processed by Eclair is entitled to object to the processing of their personal data.

The aforesaid rights can be exercised using the contact details provided above, especially at GDPR@eclair.aero.

The reception of electronic business communications can be cancelled via a link that is part of each individual business communication.

Supervisory body

The Czech Republic's public supervisory body for personal data protection is the Office for Personal Data Protection, 27 Pplk. Sochora, Postcode 170 00, Prague 7, www.uoou.cz where it is possible to file a complaint if you believe that Eclair has violated the personal data processing & protection legislation.