

## **I. CONTROLLER OF PERSONAL DATA**

SkyCloud s.r.o, with registered office Praha – Nové Město, Revoluční 1403/28, Postal Code 110 00, Company ID No. 04903641 recorded in the Commercial Register administered by the Municipal Court of Prague under file no. 255406 C (hereinafter “Controller”)

## **II. PRINCIPLES OF THE CONTROLLER FOR PROCESSING PERSONAL DATA**

The controller performs the processing of Personal Data in an open, just, and transparent manner, to the extent necessary for fulfilling the purpose and respecting all principles essential for the protection of the rights of the client such as to prevent unauthorized access to his or her privacy and personal life. The controller will always provide the client with information about the processing of Personal Data always prior to executing a contractual relationship.

## **III. SCOPE AND PURPOSE OF PROCESSING PERSONAL DATA**

Personal Data is processed by SkyCloud to the extent to which it has been provided to the controller by the subject of the data or any applicable third parties. The purpose of processing the Personal Data is the performance of the contractual relationship between the controller (provider of services) and the subject of the data (the client) for the purpose of obtaining compensation for improperly operated flights or problems with luggage. In these cases the data is used for the purposes of providing services, the option of payment transactions, the generating of billing and the performance of operations associated therewith, and for accounting and tax purposes pursuant to the obligations stipulated by the legal regulations of Act No. 586/1992 Coll. on income tax, Act No. 235/2004 Coll., on value-added tax, and Act No.563/1991 Coll. on accounting. Personal Data is also processed for the purposes of collecting debts and for the protection of the legitimate interests of the controller.

Another purpose for processing personal data is the sending of news from the world of compensation, news regarding changes in legislation, and news regarding our products, discounts, or other items of interest. For this activity you may provide us with consent to process your personal data. In this case this represents voluntary processing of personal data, which we perform on the basis of the consent you have granted. Opting not to grant this consent does not influence the provision of the services of our company.

## **IV. DURATION OF PROCESSING**

In accordance with the deadlines listed in the obligations arising from the specific contracts, the record keeping or disposal guidelines of the controller, or other legal regulations. This always consists of the period essential upholding the rights and obligations of the controller. Given the options and length of the period for claiming compensation at the airline, a period of 3 years has been set for retaining Personal Data from the date of the problematic flight.

## **V. METHOD OF PROCESSING AND PROTECTION OF PERSONAL DATA**

Your personal data may be processed automatically or manually. We collect your personal data in the event that you order or prepay our services, that you register for the purposes of ClaimCloud assistance services (e.g. by giving your first name, last name, telephone contact information, and email addresses when establishing your account in the customer section), or when you visit web pages containing our online form.

We can also collect your data from other sources (i.e. indirect collection), for example from the Commercial Register, Trade Licensing Register, the Debtor Register, etc., all in compliance with the law.

We also collect written communications between you and SkyCloud, or between you and airlines, that have been sent by you to SkyCloud as evidential material. In addition, materials related to your questions and requests directed toward SkyCloud, etc. If you provide SkyCloud with your personal data when ordering services in associated with a marketing promotion or offer, we use it solely in compliance with the law and solely for ensuring and maintaining contact between your person and SkyCloud.

Technical/organizational measures for protecting personal data have been adopted to protect your Personal Data, namely measures for the prevention of accidental or unauthorized access to client data and the prevention of the loss, destruction, unauthorized transmission, unauthorized processing, or other abuse of such data. Subjects to whom such data is assigned for reasons of legal disputes or technical administration of requests and administration of the SkyCloud platform are instructed and obligated to respect the right of the client and his or her privacy. These subjects declare that they shall proceed in accordance with valid legal regulations pertaining to the protection of Personal Data.

#### CATEGORIES OF PERSONAL DATA PROCESSED

- Identification and address information (name, date of birth, birth ID number, company ID number/VAT number, address, contact information/email or telephone number, honorific/gender)
- Descriptive information (banking coordinates, invoicing information)
- Information necessary for performing the agreement (tickets, boarding passes, electronic reservations, confirmation of payment of tickets, confirmation of payment of accounts or supplementary services, copy or originals of receipts, copies or originals of PIR and Damage Report claim protocols)
- Information provided on the basis of consent granted (copy of travel documents/passport or ID card)

#### **VI. SOURCES OF PERSONAL DATA**

- Direct – from the subject of the data, also in the manner of telephone, email, web pages, online forms, business cards, etc.)
- Indirect – provided by third parties (persons as a source of recommendations)
- Publicly available (open sources) – registries, land offices, lists

#### **VII. PROVISION OF PERSONAL DATA TO THIRD PARTIES**

We do not provide your Personal Data to any third parties/commercial subjects. Personal Data is provided only to third parties who provide services for SkyCloud associated with the purpose of providing personal data from the subject of the data, namely the partner law firm. We may also provide Personal Data to persons we are obligated by law to give access to Personal Data – public administration, courts, authorities of criminal justice.

#### **VIII. PROVISION OF CONSENT AND WITHDRAWAL OF CONSENT OR RIGHT TO ERASURE**

You always grant your consent to the processing of Personal Data for a specific purpose, namely:

- a) Consent with the wording of the General Terms and Conditions, information on the condition of executing a distance contract in the meaning of Act No. 89/2012 Coll., the Civil Code, as amended.

- b) Consent to the processing of personal data pursuant to § 11 of Act No. 101/2000 Coll., on personal data protection, as amended, while being duly informed of the processing of personal data in association with the request for providing services from SkyCloud.
- c) Consent with the sending of commercial communications defined such that SkyCloud offers products and news pertaining to the airline industry, compensation, and supplemental products (e.g. the Recommend and Gain program) offered by SkyCloud.

As part of the process of executing a contract or at any point in time thereafter, you have the right not to grant consent to the processing of the personal data, which is voluntary, or to withdraw this consent at any time. Also as part of your customer account you have the option to manage the consent you have granted.

#### Option to withdraw consent

As part of this so-called voluntary processing you are entitled to withdraw your consent at any time. The options for granting consent or withdrawing consent to voluntary processing are available in your customer account on the website of the ClaimCloud service.

Right to erasure represents the obligation to delete the personal data of the subject of the data processed by the Controller if at least one of the following conditions is met:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed,
- you have withdrawn your consent and there is no other legal reason for the processing of this data,
- you object to the processing and there is no justifiable reason for processing it,
- your personal data was processed unlawfully,
- your personal data must be deleted in order to fulfil legal obligations.

## IX. INSTRUCTIONS

The Controller processes data with the consent of the subject of the data with the exception of cases stipulated by law, in which the processing of Personal Data does not require the consent of the subject of the data. Pursuant to Article 6 paragraph 1 of the Regulation (GDPR), the Controller may process [the following data without the consent of the subject of the data](#).

## X. RIGHTS OF DATA SUBJECTS

The Controller informs the subject of the data of the right to access your personal data and to information listed in [Articles 15 through 22 of the GDPR Regulation](#).

***This declaration is publicly available at the website of the controller.***