

ROMANIA PRIVATE TOURS

PRIVACY POLICY & COOKIES

We encourage you to read this Privacy Policy carefully. If you do not wish your personal information to be used by us as set out in this Privacy Policy, please do not provide us with your personal information. Please note that in such a case, we may not be able to provide you with our services, you may not have access to and/or be able to use some features of the Website, and your customer experience may be impacted.

If you have any queries or comments relating to this Privacy Policy, please contact us at hello@romaniaprivatetours.com.

1.Our identity and contact details

This website and the domain www.romaniaprivatetours.com is owned and operated by SC Boots and Roses SRL (collectively referred to in this document as “Boots and Roses”, “we” “our” or “us”), registered in Romania under company number 38410687 and EUROPEAN UNIQUE IDENTIFIER NUMBER (EUID) ROONRC.J40/18175/2017.

REGISTERED OFFICE

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2.Purpose of this Privacy Policy

This Privacy Policy applies to the personal information that Boost and Roses collects and processes.

Boots and Roses always informs its clients for which purpose the personal information are collected. This Privacy Policy is a transparent summary that explains how we collect, use, manage, process and share the personal information of our clients.

3.Legal framework

This Privacy Policy is subject to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal information and on the free movement of such information, and repealing Directive 95/46/EC (General information Protection Regulation).

4.Personal information security

Boots and Roses collects your personal information for explicit and legitimate purposes only. Boots and Roses needs to collect, use and disclose personal information in order to perform its business functions and activities, including making and managing travel bookings on behalf of its clients. Boots and Roses is firmly committed to protecting the privacy and confidentiality of personal information and to maintaining various physical, electronic and procedural safeguards to protect personal information in its care.

5.Personal information Boots and Roses collects

Personal information has the meaning given under your local information protection law, and, where the GDPR applies, the meaning of personal information given under the GDPR.

Generally, the type of personal information Boots and Roses collects about you is the information that is needed to facilitate your travel arrangements and bookings and to arrange travel related services and/or products on your behalf.

As a result, Boots and Roses may collect and process the following information about you:

- a. name, first name, email, telephone, address;
- b. nationality, date of birth, place of birth, gender, the type of your travel document (e.g. passport or ID), eID number, the issue date and the expiry date, the country of issue of your travel document;
- c. information about other passengers in your booking such as first name, name, nationality and age;
- d. information about your transaction, including your payment card details;
- e. information regarding your flight(s) and information about our services in relation to your flight(s) (for example declaration of lost baggage);
- f. your communication with us (for example your emails, letters, calls or your messages on our online chat service);
- g. your messages on social media directed at Boots and Roses;
- h. your feedback;
- i. your preferred departure locations;
- j. if you need special help or if you have specific dietary requirements;
- k. information about your health, if you have a medical condition that may affect your flight;

In some circumstances, Boots and Roses may collect personal information from you which may be regarded as sensitive information under your local information protection laws. Sensitive personal information can be collected in the following circumstances:

- a. if you have a specific medical condition, you must inform us about it and, if necessary, provide a medical certificate for your own safety
- b. if you request special assistance during a flight, for example if you need a wheelchair
- c. if you notify us of specific dietary requirements, this may refer to specific religious beliefs
- d. when you provide us your travel document, your racial or ethnic origin can be deduced on the basis of your nationality

By sharing sensitive personal information with us, you explicitly agree that we are allowed to collect and use this information in accordance with this Privacy Policy, so that we can provide our services.

If you do not allow us to process sensitive personal information, this can have as a consequence that we cannot provide the services you have requested or that we can only partially provide the services. Please note that in such circumstances you are not entitled to reclaim any payment.

6.How Boots and Roses collects personal information

Boots and Roses only collects personal information in compliance with your local information protection laws. We usually collect your personal information from the information you submit during the course of your relationship with us. Generally, this collection will occur:

- a. when you deal with us either in person, by telephone, letter, email;
- b. when you visit any of our websites; or
- c. when you connect with us via social media.

We may collect personal information about you:

- a. when you purchase or make enquiries about travel arrangements or other products and services;
- b. when you enter competitions or register for promotions;
- c. when you subscribe to receive marketing from us (e.g. e-newsletters);
- d. when you request brochures or other information from us; or
- e. when you provide information, or use our services, on social media.

Unless you choose to do so under a pseudonym or anonymously, we may also collect your personal information (other than sensitive information) when you complete surveys or provide us with feedback. In some circumstances, it may be necessary for us to collect personal information about you from a third party. This includes where a person makes a travel booking on your behalf which includes travel arrangements to be used by you (e.g. a family or group booking or a travel booking made for you by your employer). Where this occurs, we will rely on the authority of the person making the travel booking to act on behalf of any other traveller on the booking.

Where you make a travel booking on behalf of another person (e.g. a family or group booking or a travel booking made for an employee), you agree you have obtained the consent of the other person for Boots and Roses to collect, use and disclose the other person's personal information in accordance with this statement and that you have otherwise made the other person aware of this statement.

You should let us know immediately if you become aware that your personal information has been provided to us by another person without your consent or if you did not obtain consent before providing another person's personal information to us.

7. How and to what purpose Boots and Roses uses your personal information

We will only process your information, where:

- a. you have given your consent to such processing
- b. the processing is necessary to provide our services to you;
- c. the processing is necessary for compliance with our legal obligations; and/or
- d. the processing is necessary for our legitimate interests or those of any third party recipients that receive your personal information

Boots and Roses uses your personal information for the following purposes:

- a. to manage your travel bookings and to deliver our services to you;
- b. to communicate with you;
- c. to book and manage travel and/or travel related products and services (e.g. hotels, restaurants, transport). We also use your personal information to change your bookings when you request for such changes;
- d. to let you know if there are any changes to your reservations or if there are other circumstances that may affect your travel plans, such as road works etc.
- e. to contact you by email and/or SMS for administrative or operational reasons, for example to send you a confirmation of your bookings and payments, to inform you about your travel schedule or to advise you about possible changes to your itinerary. Note that the purpose of this communication is not marketing and therefore you will continue to receive this information, even if you opt-out of receiving marketing communication;
- f. to request for your feedback by email and/or SMS, since your opinion is of great importance to us;
- g. to understand what you find interesting, we can collect information about how you use our website, which pages of our website you visit the most and which flights you are looking for. We may use this information to send you relevant messages that we think you may like, but only on condition that you have agreed to receive marketing communication;
- h. to adapt our services to your needs and preferences and to offer you a personalised customer experience;
- i. to comply with our legal obligations and any applicable customs/immigration requirements relating to your travel; and
- j. other purposes as authorised or required by law (e.g. to prevent a threat to life, health or safety, or to enforce our legal rights).

- k. the business purposes for which we will use your information include accounting, invoicing and audit, credit card or other payment card verification, fraud screening, security, legal purposes, statistical and marketing analysis, system testing, maintenance and development.

8. Disclosure of your personal information to third parties

We do not and will not sell, rent out or trade your personal information. We will only disclose your personal information to third parties in the ways set out in this Privacy Policy and, in particular, as set out below, and in accordance with your local information protection laws. Note that, in this Privacy Policy, where we say “disclose”, this includes to transfer, share (including verbally and in writing), send, or otherwise make available or accessible your personal information to another person or entity.

Your personal information may be disclosed to the following types of third parties:

- a. our contractors, suppliers and service providers, including without limitation:
- b. suppliers of IT based solutions that assist us in providing products and services to you
- c. publishers, printers and distributors of marketing material;
- d. event and expo organisers;
- e. marketing, market research, research and analysis and communications agencies;
- f. mailing houses, freight services, courier services; and
- g. external business advisers (such as lawyers, accountants, auditors and recruitment consultants);
- h. travel service providers such as travel wholesalers, tour operators, airlines, hotels, car rental companies, transfer handlers and other related service providers;
- i. any third party to whom we assign or novate any of our rights or obligations;
- j. a person making your travel booking on your behalf, where you are travelling on a booking made on your behalf by another person (for example, a family member, friend or work colleague);
- k. your employer, where you are an employee of one of our corporate, business or government clients and you are participating in an event or travelling for work purposes;
- l. a person who can verify to us that they have a relationship with you (e.g. a family member) where you are not contactable, the person correctly answers our required security questions and the request is, in our opinion, in your interest (for example, where the person is concerned for your welfare or needs to undertake action on your behalf due to unforeseen circumstances);
- m. as required or authorised by applicable law, and to comply with our legal obligations;
- n. customs and immigration to comply with our legal obligations and any applicable customs/immigration requirements relating to your travel;
- o. government agencies and public authorities to comply with a valid and authorised request, including a court order or other valid legal process;
- p. various regulatory bodies and law enforcement officials and agencies, including to protect against fraud and for related security purposes; and
- q. enforcement agencies where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter.

Other than the above, we will not disclose your personal information without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety of an individual or to public health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), or where such disclosure is authorised or required by law (including applicable privacy / information protection laws).

On our website, you may choose to use certain features that can be accessed through, or for which we partner with, other entities that are not otherwise affiliated with us. These features, which include social networking and geo-location tools, are operated by third parties, including social networks, and are clearly identified as

such. These third parties may use or share personal information in accordance with their own privacy policies. We strongly suggest you review the third parties' privacy policies if you use the relevant features.

If your personal information are transferred outside the EEA (the European Economic Area includes the European Union, Iceland, Liechtenstein and Norway, also known as the "EEA"), we require that appropriate precautionary measures have been taken.

However, it is possible that information will be transferred to an overseas recipient located in a jurisdiction where you will not be able to seek redress under your local information protection laws and that does not have an equivalent level of information protection as in your jurisdiction. To the extent permitted by your local information protection laws, we will not be liable for how these overseas recipients handle, store and process your personal information.

9. Your rights to your personal information

If you wish to:

- a. update, modify, delete or obtain a copy of the personal information that we hold on you; or
- b. restrict or stop us from using any of the personal information which we hold on you, including by withdrawing any consent you have previously given to the processing of such information; or
- c. where any personal information has been processed on the basis of your consent or as necessary to perform a contract to which you are a party, request a copy of such personal information in a suitable format, you can request this by emailing us at the address set out in section 1 above. You will receive acknowledgement of your request and we will advise you of the timeframe within which you will receive your information pack.

We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

We reserve the right to deny you access for any reason permitted under applicable laws. Such exemptions may include national security, corporate finance and confidential references. If we deny access or correction, we will provide you with written reasons for such denial unless it is unreasonable to do so and, where required by local information protection laws, will note your request and the denial of same in our records.

Further correspondence regarding your request should only be made in writing to the information Protection Officer at the address set out in section 1 above.

Please note that, if you request that we restrict or stop using personal information we hold on you, or withdraw a consent you have previously given to the processing of such information, this may affect our ability to provide services to you or negatively impact the services we can provide to you. For example, most travel bookings must be made under the traveller's full name and must include contact details and appropriate identification (e.g. passport details). We cannot make bookings for you without that information.

You must always provide accurate information and you agree to update it whenever necessary. You also agree that, in the absence of any update, we can assume that the information submitted to us is correct, unless we subsequently become aware that it is not correct.

You can at any time tell us not to send you marketing communications by email by clicking on the unsubscribe link within the marketing emails you receive from us or by contacting us as indicated above (section 1).

In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of personal information.

We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your personal information, and for any additional copies of the personal information you request from us.

10.Obligation to report in case of information leaks

In case of a information breach where there is a risk for the violation of the rights and freedoms of the individuals, Boots and Roses promises to report as soon as possible to the supervisory authority and this no later than 72 hours after the first discovery of the information leak.

If the information breach is likely to pose a high risk to your rights and freedoms, we will immediately report the information breach to the customer whose personal information is leaked.

11.Retention period of personal information

Boots and Roses stores your personal information for a period of 10 years from the invoice date.

At the end of the retention period or on a valid request of the information subject, the personal information will be deleted, unless there are reasons of public interest to keep the personal information for a longer period.

12.Marketing communication

You can choose whether or not you want to receive marketing communication. We will only send marketing communication to the customers who have given a voluntary and explicit permission to receive our newsletters or blog updates. The newsletters and blog articles contain information about special offers and new routes and travel experiences. Please note that we do not share your contact information and personal information with other companies for marketing purposes, unless we have obtained explicitly your consent to do so.

You can ask at any time to end marketing communication by sending an email to the address above (section 1) or unsubscribe directly from the newsletter or blog article by clicking the Unsubscribe link included on the respective page.

13.Social media integrations

Our website may use social media features and widgets (such as "Like" and "Share" buttons/widgets) ("SM Features"). These are provided and operated by third party companies (e.g. Facebook, Instagram) and either hosted by a third party or hosted directly on our website or mobile application. SM Features may collect information such as the page you are visiting on our website/mobile application, your IP address, and may set cookies to enable the SM Feature to function properly.

If you are logged into your account with the third party company, then the third party may be able to link information about your visit to and use of our website or mobile application to your social media account with them. Similarly, your interactions with the SM Features may be recorded by the third party. In addition, the third party company may send us information in line with their policies, such as your name, profile picture, gender, friend lists and any other information you have chosen to make available, and we may share information with the third party company for the purposes of serving targeted marketing to you via the third party social media platform. You can manage the sharing of information and opt out from targeted marketing via your privacy settings for the third party social media platform.

Your interactions with these SM Features are governed by the privacy policy of the third party company providing them. For more information about the information practices of these third party companies, and to find out more about what personal information is collected about you and how the third party uses such personal information, please refer to their privacy policy directly.

14.IP addresses

When you access our website, use any of our mobile applications or open electronic correspondence or communications from us, our servers may record information regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer, and which are generally assigned when you access the internet.

We may use IP addresses for system administration, investigation of security issues and compiling anonymised information regarding usage of our website and/or mobile applications. We may also link IP addresses to other personal information we hold about you and use it for the purposes described above (e.g. to better tailor our marketing and advertising materials, provided you have opted in to receive electronic marketing).

15.Cookies or other tracking technologies

In order to improve our services, to offer you relevant information and to analyse how you use our website, we can use technologies such as tracking software, pixels and cookies. Keep in mind that in most cases we cannot identify you on the basis of the information we collect through these technologies.

We use software to monitor how the website is used in order to improve the experience of the customer. This software does not allow us to collect personal information.

In order to understand how our customers deal with the emails we send them, we use pixels, so that we can see whether the emails we send are opened or not.

We also use cookies on our website or in our emails. Cookies are small pieces of information that your browser stores on the hard drive of your computer. They allow you to navigate on our website and allow us to remember certain aspects of your last search to make subsequent searches faster for you.

You can delete cookies if you wish. While certain cookies are required for viewing and navigating on our website, most functions are still accessible without cookies.

16.Changes to our privacy policy

We may amend this Privacy Policy from time to time, for example to keep it up to date, to implement minor technical adjustments and improvements or to comply with legal requirements. We will always update this Privacy Policy on our website, so please try to read it when you visit the website.