

Travellers Using Travel Services

This notice is addressed to individuals using travel services provided by eTravel S.A. – both those who make reservations themselves and those whose bookings are made by another person (e.g. a travel booker employed by a company that has an agreement with eTravel S.A.).

If you did not make your booking yourself, your personal data may have been provided to us by your employer or by the person who made the booking. In that case, this notice fulfils the information obligation under Article 14 GDPR.

1. Data Controller

Controller	eTravel S.A., Al. Jerozolimskie 96, 00-807 Warsaw, Poland
Contact	Tel. +48 22 492 08 60, e-mail: sekretariat@etravel.pl
Data Protection Officer (DPO)	Contact the DPO at: rodo@etravel.pl

2. Categories of Personal Data We Process

Depending on the type of service ordered, we process data including:

- identity data: name, surname, date of birth, gender, identity document/passport number, nationality
- contact data: e-mail address, phone number
- travel data: seat preferences, hotel preferences, meal preferences, special requirements arising from health conditions (e.g. special diet, gluten-free meal, wheelchair assistance – these may constitute special category data)
- payment data: to the extent necessary to settle the service
- loyalty programme data (if provided)

Health-related data (e.g. special diet, gluten-free meal, need for boarding assistance) constitutes special category data within the meaning of Art. 9 GDPR. We process such data only on the basis of your explicit consent (Art. 9(2)(a) GDPR) or where necessary to protect your vital interests (Art. 9(2)(c) GDPR).

3. Purposes and Legal Bases for Processing

Purpose	Legal basis (GDPR)
Preparing a quote, making reservations (flights, hotels, transport, transfers, insurance) and performing the travel service ordered	Art. 6(1)(b) – performance of a contract / pre-contractual steps
Transferring data to service providers (airlines, hotels, car rental companies, insurers) – required to fulfil the booking	Art. 6(1)(b) – performance of a contract
After-sales support: amendments, cancellations, complaints, claims handling, call centre and emergency helpline	Art. 6(1)(b) – performance of a contract; Art. 6(1)(f) – legitimate interests (customer service and claims)
Protecting your health, life and property during travel (e.g. emergency line, crisis situations)	Art. 6(1)(d) – protection of the vital interests of the data subject

Purpose	Legal basis (GDPR)
Running loyalty programmes (our own or those of service providers)	Art. 6(1)(a) – consent
Direct marketing (offers to existing clients)	Art. 6(1)(f) – legitimate interests (marketing to existing clients); you have the right to object
Sending commercial information electronically (if you have given consent)	Art. 6(1)(a) – consent (Electronic Services Act)
Administrative purposes, sales reporting, fraud prevention, service improvement	Art. 6(1)(f) – legitimate interests of the controller
Complying with requirements of competent public authorities	Art. 6(1)(c) – legal obligation

4. Recipients of Your Data

To fulfil your booking, data is transferred to:

- airlines, hotels, hotel chains, car rental companies, transport companies, shipping companies, rail operators
- insurance companies
- reservation system providers (GDS: Amadeus, Sabre, Galileo and others)
- visa intermediaries (where applicable)
- financial institutions handling payments
- IT and call centre service providers
- law firms
- public administration authorities

Transfers outside the European Economic Area (EEA): Providing travel services frequently requires transferring data to countries outside the EEA (e.g. airlines, hotels or reservation systems headquartered outside the EU). Such transfers are made with appropriate safeguards in place: Standard Contractual Clauses approved by the European Commission or, where necessary, on the basis of the derogation under Art. 49(1)(b) GDPR (performance of a contract with the data subject). You are entitled to obtain information about the safeguards applied – please contact us.

5. Retention Period

We retain your data for the period necessary to perform the service and thereafter:

- for the limitation period for claims under the agreement (generally 3 years for travel service claims, 6 years for general civil claims)
- financial records: 5 years from the end of the financial year, in accordance with accounting legislation
- data processed on the basis of consent: until consent is withdrawn
- upon expiry of the above periods, data is deleted or anonymised

6. Your Rights

- right of access to data (Art. 15 GDPR)
- right to rectification (Art. 16 GDPR)
- right to erasure (Art. 17 GDPR) – subject to exceptions, e.g. where processing is necessary to assert claims

- right to restriction of processing (Art. 18 GDPR)
- right to data portability (Art. 20 GDPR)
- right to object to processing based on legitimate interests (Art. 21 GDPR)
- right to withdraw consent at any time – without affecting the lawfulness of processing carried out before withdrawal
- right to lodge a complaint with the President of the Personal Data Protection Office (UODO), ul. Stawki 2, 00-193 Warsaw, Poland

Providing your data is voluntary but necessary to fulfil the travel service you have ordered. Without your data, we cannot complete the booking.

Contact for data protection matters: rodo@etravel.pl

Final Notes – Legal Information

1. Legal Basis of This Document

This document fulfils information obligations arising from:

- Art. 13 GDPR – where data is collected directly from the data subject
- Art. 14 GDPR – where data is collected from another person or entity (e.g. the traveller's employer, the client company)
- Art. 12 GDPR – requirement for transparency and intelligibility of information

2. Updates to This Document

eTravel S.A. reserves the right to update this document in the event of changes to its data processing activities, changes in applicable law or guidance issued by supervisory authorities. The current version is always available at: etravel.pl/en/rodo. We will communicate material changes in a manner appropriate for each category of data subjects (e.g. by e-mail for CTA users, by a notice on our website for others).

3. Contact and Exercising Your Rights

E-mail (recommended)	rodo@etravel.pl
Phone	+48 22 492 08 05
Postal address	Data Protection Officer, eTravel S.A., Al. Jerozolimskie 96, 00-807 Warsaw, Poland
Response time	No later than 30 days of receiving a request (Art. 12 GDPR); in complex cases the period may be extended by a further 2 months
Supervisory authority	President of the Personal Data Protection Office (UODO), ul. Stawki 2, 00-193 Warsaw, Poland, tel. +48 606 950 000, www.uodo.gov.pl

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