CTA Platform Users (Online Booking)

This notice is addressed to individuals holding a user account on the CTA (Corporate Travel Application) platform – an online travel booking system offered by eTravel S.A. in a SaaS model.

CTA is an online platform for managing corporate travel bookings. Your user account is created by a system administrator on your employer's side or by eTravel S.A. under its agreement with your employer.

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
Relationship with your employer	eTravel S.A. is the data controller for platform user data. Your employer, as an eTravel S.A. B2B client, may be a separate controller for data relating to your travel policy and authorisations.

2. Data Stored in Your User Profile

As part of your CTA user account, we process:

- identity data: name, surname, login (e-mail address or work identifier)
- travel document data: passport/ID number, expiry date, nationality
- travel preferences: travel class, seat preferences, meal preferences, hotel chain preferences, loyalty programme numbers
- contact data: work phone number, work e-mail address
- data required by your employer's travel policy: cost centre, project code, department, approver
- history of bookings and transactions made via the platform
- login and activity data (system logs, date of last login)

3. Purposes and Legal Bases for Processing

Purpose	Legal basis (GDPR)
Providing the SaaS service – maintaining the user account, enabling travel search and booking, managing profile preferences	Art. 6(1)(b) – performance of a contract (between eTravel S.A. and your employer, the services of which you use as a user)
Automatic application of your employer's travel policy during search and booking (e.g. displaying only in-policy options)	Art. 6(1)(f) – legitimate interests of the controller (fulfilling the agreement with your employer and ensuring travel policy compliance)
Generating travel reports and analytics (for your employer and system administrators)	Art. 6(1)(f) – legitimate interests (travel programme management and settlements)
Ensuring system security and preventing abuse (access logs, activity monitoring)	Art. 6(1)(f) – legitimate interests (IT system security)
Improving platform functionality and providing technical support	Art. 6(1)(f) – legitimate interests of the controller

Purpose	Legal basis (GDPR)
Handling support tickets and help desk requests	Art. 6(1)(b) – performance of a contract / Art. 6(1)(f) – legitimate interests
Fulfilling legal obligations (transaction records, tax settlements)	Art. 6(1)(c) – legal obligation

4. Recipients of Your Data

Your data may be shared with:

- your employer (eTravel S.A.'s client) – in the scope of travel reports, authorisations and travel programme management
- travel service providers (airlines, hotels, car rental companies) – solely for the purpose of making a booking
- reservation system providers (GDS)
- IT and hosting service providers (processing data under data processing agreements)
- public administration authorities – as required by law

> Data may be processed on servers located within the EEA or outside the EEA, with appropriate data transfer mechanisms in place (Standard Contractual Clauses). Detailed information about data processing locations and safeguards is available on request at: rodo@etravel.pl.

5. Retention Period

- user account data: for the duration of the active account and for 12 months after deactivation (for potential claims and audits)
- booking and transaction history: 6 years from the end of the financial year (tax and accounting obligations)
- system logs and activity data: 12 months, extendable in the event of a security incident
- data processed on the basis of consent: until consent is withdrawn

6. Your Rights

- right to access and view your profile data (Art. 15 GDPR)
- right to rectify inaccurate or incomplete data (Art. 16 GDPR)
- right to erasure of data after account deactivation – to the extent legally permissible (Art. 17 GDPR)
- right to restriction of processing (Art. 18 GDPR)
- right to object to processing based on legitimate interests (Art. 21 GDPR)
- right to lodge a complaint with the President of the Personal Data Protection Office (UODO)

Contact: rodo@etravel.pl or in writing to the registered address of eTravel S.A.

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

Document prepared in accordance with Regulation (EU) 2016/679 (GDPR) | Version: 2026 | eTravel S.A.