

Newsletter Subscribers

This notice is addressed to individuals who have subscribed to the eTravel S.A. newsletter or have consented to receiving commercial and marketing information electronically.

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

- e-mail address (required to send the newsletter)
- first name (optional – for message personalisation)
- date and time of subscription and confirmation (double opt-in)
- technical data: content preferences (if provided at the time of sign-up)

3. Purposes and Legal Bases for Processing

Purpose	Legal basis (GDPR)
Sending the newsletter – information about services, promotions and the current offer of eTravel S.A. and affiliated entities	Art. 6(1)(a) GDPR – your consent; Art. 10(2) of the Act on Electronic Services – consent to e-mail marketing communication
Analysing the effectiveness of communications sent (open and click statistics) – to improve newsletter content	Art. 6(1)(f) – legitimate interests (optimising communications); you have the right to object
Documenting consents given (defending against potential claims)	Art. 6(1)(f) – legitimate interests of the controller

Consenting to receive the newsletter is voluntary and you may withdraw your consent at any time by clicking the unsubscribe link in any e-mail or by writing to us at rodo@etravel.pl. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

4. Recipients of Your Data

Your data may be shared with:

- e-mail delivery and marketing automation platform providers – under data processing agreements
- analytics service providers (in the scope of newsletter statistics)

Where marketing tool providers process data outside the EEA, we apply appropriate safeguards (Standard Contractual Clauses).

5. Retention Period

- active subscriber data: for the entire duration of the subscription
- after unsubscribing: data is deleted or anonymised within 30 days, except for data required to document consent history and unsubscription (retained for 3 years after unsubscription – for evidentiary purposes)

6. Your Rights

- right of access to data (Art. 15 GDPR)
- right to rectification (Art. 16 GDPR)
- right to erasure (Art. 17 GDPR)
- right to restriction of processing (Art. 18 GDPR)
- right to object to processing based on legitimate interests – e.g. analytical profiling (Art. 21 GDPR)
- right to withdraw consent at any time (without affecting prior processing)
- 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.