



Privacy Policy

Plus Group Kft. (1033 Budapest, Polgár utca 8-10., www.plusairsolutions.com, informationsecurity@plusairsolutions.com, tax number: 22976309-2-41, hereinafter: Plus Group Kft., service provider or controller), as controller acknowledges the content of this legal notice binding upon himself.

This policy is to set out the principles of the data protection and processing applied by Plus Group Kft. as well as the privacy policy of the Company.

Plus Group Kft. guarantees that any processing related to its activity satisfies the requirements specified in this policy and the current legislation.

This privacy policy shall be valid even if you have reserved your transfers through the other sales partners of Plus Group Kft.

Plus Group Kft. is committed to the privacy of his clients and partners, gives priority to the respect for his clients' right of informational self-determination and takes all security, technical and organizational measures that guarantee the data security.

This privacy policy informs you of such issues as what personal data we collect of you, how and why we use, with whom we share and protect your personal data.

Definitions:

- **“personal data”** means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **“other sales partner”** means any airline or travel agency;
- **“consent”** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her in full or applicable on to certain operations;
- **“objection”** means the statement made by the data subject to objects to the processing of the personal data relating to him and to request for discontinuation of the processing or for the erasure of the processed data;

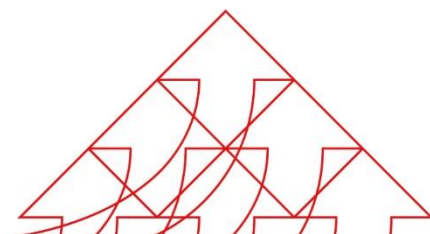
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- **“processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **“restriction of processing”** means the marking of stored personal data with the aim of limiting their processing in the future;
- **“controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **“disclosure by transmission”** means making data available to a specific third party;
- **“public disclosure”** means making data available to the general public;
- **“erasure of data”** means the destruction or elimination of data sufficient to make them irretrievable;
- **“blocking of data”**: means mean the marking of stored data with the aim of limiting their processing in future permanently or for a predetermined period; 10. destruction of data means the complete physical destruction of the medium containing data;
- **“data processing”** means the technical operations involved in data control, irrespective of the method and instruments employed for such operations and the venue where it takes place, provided that such technical operations are carried out on the data;
- **“processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **“third party”** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- **“EEA Member State”**: means mean any Member State of the European Union and any State that is a party to the Agreement on the European Economic Area, furthermore, any other country whose citizens are enjoying the same treatment as nationals of States who are parties to the Agreement on the European Economic Area by virtue of an agreement between the European Union and its Member States and a State that is not a party to the Agreement on the European Economic Area;
- **“third country”** means any State other than EEA Member States;

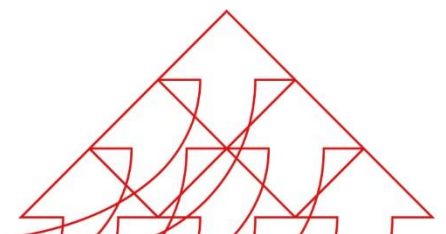
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- **“consent”**: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **“personal data breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- **sensitive (special) personal data** means personal data revealing racial, national or ethnic origin, political opinions and any affiliation with political parties, religious or philosophical beliefs as well as personal data concerning health, addictions or sex life, personal data consisting of information as to the racial or ethnic origin of the data.

I. Who is responsible for the personal data of passengers?

Our privacy policy applies to the personal data collected and used by Plus Group Kft.

II. Personal data collected from our passengers

The term “personal data” used in our privacy policy means the information relating to you that enables us to identify you together with other information possibly, whether directly or indirectly, possessed by us. Personal data could be, for instance, name, contact details, information relating to route (e.g. reservation code) as well as the information relating to the use of our website or to the communications with us.

We collect some of the personal data of you when you are booking transfer, using our website and services or contacting us. We may also obtain your personal data from our airline partners when purchasing our products (e.g. through transfer service) through their web page or through your mobile application, or from third parties acting on your behalf, for instance travel agencies or other parties booking transfer for you. If you reserve transfer for someone else (e.g. transfer service), you may use their personal data only by their consent.

For more information about the parties who may transmit their personal parties, please read paragraph 7.

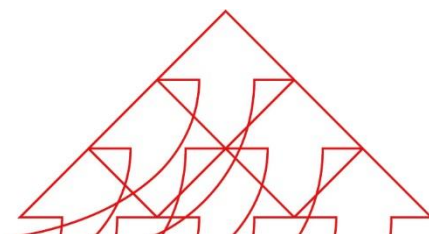
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Types of data collected by use

We may collect and the personal data of following kinds:

- **Your surname and given name as well as your contact details** (e-mail address, telephone number and mailing address)
 - when you enter the site MyBooking through our website
 - when you reserve transfer
 - when you request for bill
 - when you choose a transfer that we have published on our website
 - Information about the purchase of the products related to the journey and services provided by our partners
- **Your banking data** (Bank account number, IBAN, SWIFT code, name and address of the Bank, name and address of the account holder)
 - When we transfer back the price of the service where appropriate
- **Information relating to your reservation and route of your journey** if you need special assistance. Such information includes changes concerning the travel products related to the reservation (for instance, change of the date or destination).
 - When you make booking for the flight and handle your booking
- **Information relating to your state of health**, which may affect the journey, or you travel with a child (For more information see section "Sensitive personal data").
 - When you provide such information for us before the journey
 - When we receive such information together with your reservation
- **Information relating to the transaction**, type of the card used to the payment
 - When you purchase the service of Plus Group Kft.
- **Written or oral communications of any kind with us** (for instance, e-mails, mails, phone calls)
 - When you contact Plus Group Kft. or Plus Group Kft. contacts you

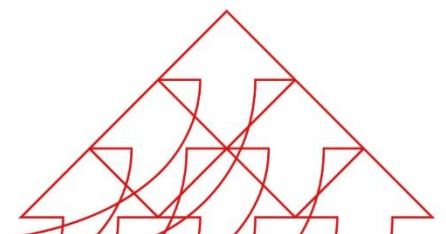
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- **Information relating to the use our website**, for instance, searching for transfers
 - when you are browsing on our website

III. Purposes and manner of the use of personal data

We use your personal data for the following purposes:

- **For handling reservations for journeys and providing services**

When you travel with us, we will use the information disclosed by you for providing the transfer services related to your journey, for instance, sending of e-ticket, and we will use such data for safe passenger transport. We will also use your personal data to change your transfer reservation if your request us to.

- **For contacting you or for monitoring the contact already existing with you**

We may have to contact you via e-mail and/or SMS for administrative or operating purposes, for instance, for sending confirmation of your reservations or payments, or for informing you of the details or changes in the time table of the service purchased by you.

Please note that such contacts will not serve marketing purposes.

We will also use your personal data if we contact you due to any request sent for us or if you have contacted us over telephone or via e-mail.

We will use the talks/electronic messages as well as your responses in order to be able to be able to monitor the contact existing with you or our clients and to improve the standard of our services and client experience.

- **For the improvement of our service, attainment of administrative purposes and protection of our business interests**

The business purposes, for which we will use your personal data, will be, for instance, accounting, invoicing and auditing, verification of credit card or any other payment card, screening of fraud, security and legal purposes, statistical and marketing analyses, system testing, maintenance and development.

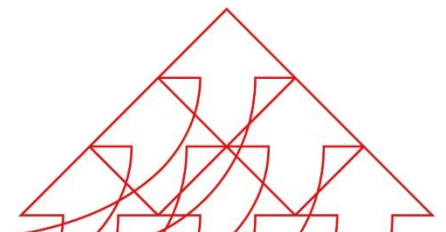
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- **For the compliance with our statutory obligations** we undertake, among others, to transmit your personal data to border guard agencies if we receive relevant official request from them.

IV. Request for access to personal data

You shall be entitled to request for the personal data relating to you. Such information shall also include the booking data that have reference to the services used with our company.

Right to erasure (“right to be forgotten”)

Under certain conditions you shall have the right to obtain from us the erasure of personal data concerning you and we shall erase such personal data. In such a case, we shall not be able to provide services for you in the future.

Right to restriction of processing

Under certain circumstances you shall have the right to request us to restrict processing of personal data. In such a case we will specify the personal data which we may process only for a special purpose.

Right to data portability

Under certain conditions you shall have the right to receive the personal data disclosed to us in digital format.

Right to withdraw consent

If you withdraw your consent you have granted us in relation to the processing of your personal data, then we may be unable to provide the requested services in full or we will be able to only in part (e.g. in the case of special assistance, if processing of special data is required).

Right to lodge complaint to the regulatory agency

If you believe that your personal data have been misused, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

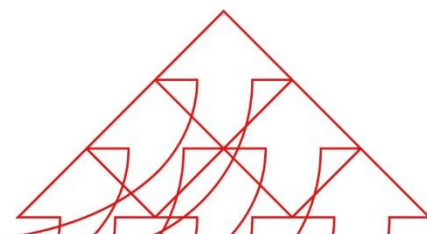
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In Hungary you may lodge a complaint to the National Authority for Data Protection and Freedom of Information: H-112 Budapest, Szilágyi Erzsébet fasor 22/C, Hungary; telephone: +36-1 391-1400; fax: +36-1 391-1410; e-mail: ugyfelszolgalat@naih.hu).

If you'd like to request a copy of the data files stored in relation to, please send an e-mail (in the English or Hungarian language) to our e-mail address serving for such purpose (informationsecurity@plusairsolutions.com). We offer you assistance to the request for personal data:

Help to request for personal data stored by Plus Group Kft.

To the request for the copy of the data stored by Plus Group Kft. please send an e-mail to address informationsecurity@plusairsolutions.com with subject "My data request", which shall contain the following information:

full name of the Passenger;

description of the data requested by the Passenger (for instance, data of the transfer booked on the website of Plus Group Kft. or those of the transfer already made), including the interval of dates;

all e-mail addresses (previous and present) used for reservations of the services of Plus Group Kft.

From the day, when we have received all the required information, we will have 30 days for processing the request. In the meantime we shall endeavour to process your request prior to the expiry of the time limit; however, we cannot guarantee that we will be able to. Please note that any missing information may delay the processing of the request. If you have any question, please e-mail us to address informationsecurity@plusairsolutions.com.

V. Security of the passengers' personal data

We shall use our best efforts to take the appropriate technical and organizational measures to protect the personal data against unauthorized or illegal processing, accidental loss, destruction or damage. When you provide your personal data on our website, we shall transmit them through the Internet with security and encryption of high degree.

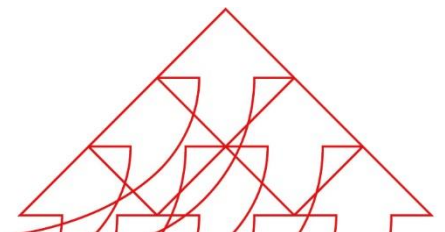
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Our web shop offers the opportunity for its customers to make payments with a secure bank card provided by CIB Bank. The security shall be founded by the division of the personal data. The Web Shop shall receive the information related with the order and the CIB Bank shall receive only the card data required to the payment transaction on the payment site with 256-byte TLS encryption. The Web Shop shall not be informed of the content of the payment site; its data content may be accessed only by CIB Bank. You shall be informed of the result of the transaction through the site of the Web Shop. The card payment can be made only if the TLS encryption is supported by your browser. The price of the purchased goods/services shall promptly be blocked on your card account. For more information please visit the web site of CIB Bank: https://www.cib.hu/kis_kozep_nagy_vallalatok/szolgalatasok/kartyaelfogadas/ecommerce/ecommm_gyik

We shall also disclose your personal data to third parties according to the provisions of our privacy policy. When Plus Group Kft. discloses your personal data to third parties, the specific third party is required to take the adequate technical and organizational actions for the protection of the personal data, however, in certain cases where disclosure to third parties, is necessary due to legal regulations, for example to border guard agencies, we may have limited influence on the party concerned what kind of protection the specific party should provide.

We shall store the information provided for us in our IT systems, located at our place of business or with a designated external third party. In addition, we may also authorize external third parties to access your personal data who act in accordance with this privacy policy or for purposes consented to by you. Your personal data may also be accessed and processed outside the European Economic Area, (Member States of the European Union as well as Iceland, Liechtenstein and Norway; commonly used abbreviation: "EEA"), including persons working outside the EEA, who work for us or for one of our partners or representatives (including the persons engaged in the fulfilment of reservations and in supporting services). If your personal data are transmitted anywhere outside the territory of the EEA, then we shall stipulate to apply the adequate protective measures.

We will retain your personal data until we need them to meet the objectives specified in your privacy policy or as required by law.

We shall not retain personal data for duration longer than it is justified: we shall retain the data for a period of six years (of the performance of the contract concluded between us (i.e. from the use of the service) so as to comply with the legal regulations pertinent to the retention of data.

Under Section 169 of Act C of 2000 on Accounting the accounting documents shall be retained for eight years after closing the financial year.

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If judicial or disciplinary procedure has been instituted, then the personal data shall be retained until the closing of the procedure, including the duration of the possible remedy, thereafter such personal data shall be erase in the case of civil law claims, after the period of limitation has expired.

In the case of processing based on consent, the personal data shall be processed until the withdrawal of the consent.

VI. Cookies and other procedure serving for tracking

The websites of Plus Group Kft. shall not use Cookies or pixels.

In order to obtain data of independent visits on the website and other web analytical information, Plus Group Kft. shall use Google Analytics software, to this end, concerning such data, the Privacy Policy of Google Inc. is available on website <https://google.com/intl/h All/policies/privacy>. Any user of the Web Site shall acknowledge that by using the website he shall assent to the processing of his personal data by Google Inc.

We shall not collect personal data by using such software.

VII. Sharing of passengers' personal data

- With travel agencies or companies through which you shall reserve any service of Plus Group Kft.
- With supplier providing services for us so that to assist us in our business operations as well as in the improvement of our services and client experience. We may share your personal data with the partners who provide services for us at destinations where we are present. At Plus Group Kft. we select the Partners with an extremely great care who shall process the personal data on our behalf and for us, and we require them to comply with the strict regulations applicable to privacy.
- With companies issuing credit-and deposit cards: Plus Group Kft. shall share your personal data in relation to the payment method and reservation of the transfer with the company producing the credit-and deposit cards used during the reservation. We shall share the following data: language code, Shopping ID, Customer ID and the total amount of the purchase.
- Our partners have their own privacy and use terms in place on which Plus Group Kft. has no influence of any kind. Although Plus Group Kft. has always selected such partners with due care, we refuse to assume liability for their privacy policy, use terms and the practice of processing personal data followed by them. Our contracts executed with our partners

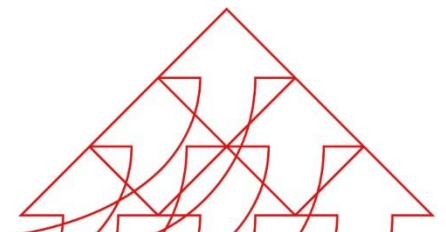
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stipulate without exception that they shall be required to comply with the Privacy Policy in force.,

- We may also share your personal even if it is prescribed by legislation of a jurisdiction under which Plus Group Kft. is established. On our website we may display links to the websites of third parties to which individual privacy policies apply. Please note that this Privacy Policy is not applicable to such websites, and Plus Group Kft. shall not be liable for any information collected on such websites by third parties.

VIII. Amendments to the Privacy Policy

We shall amend this Privacy Policy from time to time. This policy shall be effective from 25-05-2018 until withdrawal.

IX. Contact details

We shall be delighted to receive your questions, comments or requests at the following address: informationsecurity@plusairsolutions.com.

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