

## Privacy Policy

### **Personal Data Protection Policy of Castiel Ltd.**

#### I. SUBJECT

This Personal Data Protection Policy, hereinafter referred to as **the "Personal Data Protection Policy"**, presents information about the way in which Castiel Ltd., hereinafter referred to as **"Supplier"**, **"Administrator"**, **"we"** and/or **"us"**, owner/operator of the website: travelcocktails.com, hereinafter referred to as **the "Website"**, processes (including, but not limited to, collecting and storing) personal data of personal data subjects, such as the users of the Website and of the Supplier's services, hereinafter referred to as **"User(s)"**, **"you"** and/or **"you"**, as well as regarding the rights of the latter in this regard used in the Personal Data Protection Policy, has the meaning given to it in 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 data and on the free movement of such data, and repealing Directive 95/46/EC, hereinafter referred to as **the 'General Data Protection Regulation'** and/or **the 'GDPR'**, namely: 'any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by providing an identifier such as a name, identification number, location data, online identifier or one or more factors specific to that natural person's physical, physiological, genetic, mental, economic, cultural or social identity.' Below you can find brief information about:

- The Supplier
- The competent supervisory authority
- The legal basis on which we process personal data
- The purposes for which we use personal data
- Principles of personal data processing
- What personal data do we collect
- Period of retention of personal data
- Access to and transfer of personal data, and
- The rights and safeguards that the GDPR grants to data subjects.

#### II. INFORMATION ABOUT THE SUPPLIER

1. Name: Castiel Ltd., UIC 201989051.
2. Seat and address of management: Sofia, zh.k. Druzhiba 2, bl. 506, entr. A, floor 2, apt. 6,
3. Tel.: +359 887 712 882, e-mail: info@travelcocktails.com
4. Entry in public registers: Commercial Register at the Registry Agency at the Ministry of Justice of the Republic of Bulgaria.

#### III. INFORMATION ON THE COMPETENT SUPERVISORY AUTHORITY

1. Name: Commission for Personal Data Protection of the Republic of Bulgaria

2. Address: Sofia 1592, blvd. "Prof. "Tsvetan Lazarov" No 2

3. Phone: 02 915 3 5184.

4. E-mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

5. Website: <https://www.cdpd.bg/>

#### IV. GROUNDS FOR COLLECTION, PROCESSING AND STORAGE OF PERSONAL DATA

We process (including, but not limited to: collect and store) your personal data only in connection with our activities and in accordance with the requirements of the applicable legislation, including the Personal Data Protection Act of the Republic of Bulgaria and the General Data Protection Regulation. We process your personal data on the basis of at least one of the following grounds:

- Consent of the User for the processing of personal data;
- The processing of personal data is necessary for the fulfillment of the contractual obligations of the Supplier to the User;
- The processing of personal data is necessary to take steps at the request of the User before concluding a contract;
- The processing of personal data is necessary to comply with the legal obligations of the Supplier;
- The processing of personal data is necessary for the purposes of the legitimate interests of the Supplier to carry out its activities.

#### V. PURPOSES FOR COLLECTION, PROCESSING AND STORAGE OF PERSONAL DATA

We collect, process and store personal data of the Users in connection with the implementation of the services provided by us and communication in connection with the use of the Website, as well as for the following purposes:

- Communication and identification in the performance of a service contract and a contract of sale (including the performance of a relevant contract);
- Communication, identification, processing and execution of inquiries, orders placed, requests, reservations, purchases of goods or services (including preparation for concluding a contract, accepting orders, forwarding goods, solving problems related to cancellation of orders, reservations, return of purchased goods, refunds of amounts paid, etc.);
- Fulfillment of tax and other legal obligations;
- Accounting purposes in connection with the use of our services;
- Protection of our legitimate interests in connection with the fulfillment of our obligations to state and municipal authorities (for example: National Revenue Agency, Ministry of Interior);

- Protection of our legitimate interests in connection with the storage of information in order to protect against legal or tax claims and in order to improve the presentation of the Website;
- Protection of the information security of the Website;
- Statistical information about the use of the Website;
- Provision of advertising content according to the interests of the User;
- Leaving comments on the content on the Website;
- Creating and managing an account on the website and using the functionalities it provides.

If a data subject refuses to provide us with some or all of the personal data that is necessary for the relevant purpose set out above, we may not be able to provide the relevant service (e.g. to perform a contract concluded with the relevant User) or to comply with the relevant legal requirements (e.g. to enable the data subject to exercise their rights under the GDPR).

## VI. PRINCIPLES OF COLLECTION, PROCESSING AND STORAGE OF PERSONAL DATA

We comply with the following principles when collecting, processing and storing your personal data:

- lawfulness, fairness and transparency;
- purpose limitation;
- limiting the retention period in order to achieve the purposes for which the data is processed (storage limitation);
- minimising the data being processed;
- data accuracy;
- integrity and confidentiality in the processing of data and ensuring an appropriate level of security of personal data (accountability).

## VII. PERSONAL DATA

We collect the following categories of personal data of Users for the following purposes and on the following grounds:

- Your individualizing data (first and last name, telephone number and email address), as well as other data that you provide to us voluntarily, for the purposes of processing your inquiries, providing service offers and providing services on our part, at your expressed wish, including communication with you in this regard, and on the basis of taking steps at your request for the possible conclusion of a contract, performance of a contract to which you are a party or consent for processing provided by you;

- Your individualizing data (first and last name, telephone number and email address) and information related to payment and selected payment methods for the purposes of issuing and sending accounting/tax documents (invoices) in connection with the services you use, including communication with you in this regard, and on the basis of taking steps at your request for a possible conclusion of a contract, performance of a contract to which you are a party or performance of our legal obligation;
- Your individualizing data (first and last name, telephone number and email address), information related to a delivery address (only in cases where you have indicated that you want delivery to a specific address, and not to a courier office) and information related to payment and selected payment methods for the purpose of paying for orders made, reservations and/or purchased goods or services, including issuance and sending of accounting/tax documents (invoices) in connection with the registration of an account, orders made by you, reservations, purchased goods or services, and on the basis of taking steps at your request for the possible conclusion of a contract and/or performance of a contract to which you are a party;
- Your individualizing data (first and last name, phone number and email address) and information related to refunds for orders made, reservations, purchased goods or services, in case of cancellation of orders, reservations, return of products, and on the basis of performance of a contract to which you are a party and/or compliance with legal obligations;
- Your IP address, browser settings and preferred language, pages visited, as well as actions performed for the purposes of sending Push notifications, if you express your desire to receive such;
- Your IP address, pages visited, for information security protection purposes;
- Other data that may be necessary in certain cases or related to the provision of services to Users by us, including those necessary for the performance of contractual obligations (e.g. date of birth, signature, personal identification number) or other data that Users choose to voluntarily share with us, and on the basis of the performance of a contract to which you are a party, consent to processing provided by you or compliance with our legal obligation.

We do not process, respectively collect from Users, special categories of personal data (e.g. data, data, revealing racial or ethnic origin, political opinions, genetic or biometric data, as well as data on the sex life and sexual orientation of the data subject). We do not make decisions based solely on automatic data processing, including profiling. We do not process personal data of persons under the age of 14, except on the basis of the consent of their parent who exercises custody or guardian. However, it is possible that we may also receive personal data from other persons, such as: other employees, in the company in which the subject of personal data works, as well as from publicly available sources such as the Commercial Register and the Register of Non-Profit Legal Entities at the Registry Agency at the Ministry of Justice of the Republic of Bulgaria.

## VIII. PERIOD OF STORAGE OF PERSONAL DATA

We store the personal data of the Users for a period not longer than the period necessary for the fulfillment of the relevant purpose of processing or the legally established period, where applicable. For example:

- personal data provided by you when filling out the contact form will be stored until the fulfillment of the request or the satisfaction of the inquiry in connection with which you contacted us, as well as for a maximum of one year thereafter for statistics and marketing analysis;
- personal data of our clients, processed in connection with contracts concluded between us and the respective User, will be stored for a period of no longer than ten years, starting from January 1 of the year following the one in which the contract is reported for tax purposes;
- personal data of our clients processed in connection with the issuance of tax documents (invoices) will be stored for a period of no longer than ten years, starting from January 1 of the year following the one in which the document is reported for tax purposes;
- Personal data of our partners/suppliers processed in connection with contracts concluded between us and the respective partner/supplier will be stored for a period of no longer than ten years, starting from January 1 of the year following the one in which the contract is reported for tax purposes;
- the personal data of participants in recruitment procedures will be stored for a period not exceeding six months from the moment of final completion of the recruitment/selection procedure in which the personal data subject participates, unless the personal data subject in question has consented to the storage of his/her personal data for a longer period, in which case the data subject has the right to withdraw his/ her consent at any time and without giving reasons.

The retention period depends, among other things, on the duration of the legal relationship that has arisen between us and the respective User, as well as on the purposes for which the personal data are processed. Where there is an indication of a potential legal claim(s) or liability, those time limits will be extended accordingly. When processing is based on the consent of the User (for example: in the case of personal data provided by third parties for direct marketing), we store this personal data until we have valid consent for their processing. After the expiration of the above periods, we take the necessary care to delete and/or destroy your respective personal data without undue delay.

## IX. ACCESS TO PERSONAL DATA AND TRANSFER OF PERSONAL DATA TO THIRD PARTIES

In general, the personal data of the Users we process is available to our employees, representatives and partners who need them to fulfill legal obligations and/or to fulfill contractual obligations (for example: provision of a service under a contract with a User). In this regard, it is possible, at our sole discretion and in compliance with the requirements of the GDPR, to transfer

all or part of your personal data to third parties such as accountants, professional consultants, including lawyers (for the purposes of financial, accounting and administrative services of our activities), cloud platforms for data processing/storage (for the purposes of organizational servicing of our activities, for example: storage and processing of contracts with Users on cloud platforms for the purpose of greater security), companies providing postal services (for the purposes of organizational servicing of our activities, for example: sending contracts in paper form to the Users, sending goods subject to purchase and sale), IT service suppliers, system administration, marketing services (for the purpose of providing more reliable and quality work on the website and more secure data processing), service suppliers for storing other people's information (i.e. hosting companies) (for the purpose of fulfilling contracts with Users). Based on the applicable legislation or at the request of competent public authorities, all or part of your personal data may also be accessible to public authorities when there are legal grounds for such accessibility.

## X. RIGHTS OF DATA SUBJECTS

At any time while we process your personal data, and subject to the restrictions laid down in applicable law, you, the data subject, have the following rights:

- **Right of access** – you have the right to request information about whether we process your personal data, as well as to access and a copy of such personal data of yours; in case you request more than one copy of such personal data of yours, you may owe a corresponding fee for each additional copy;
- **Right to rectification** – you have the right to request that your personal data be corrected in case you believe that it is inaccurate or incomplete. We will make such corrections/ amendments without undue delay;
- **Right to erasure / to be forgotten** – in certain circumstances (for example: the personal data in question is no longer necessary for the purposes for which it was collected; you have withdrawn your consent to the processing of certain personal data of you, for the processing of which there is no other legal basis), you can request that your personal data that we process be deleted from our registers/our database without undue delay. In certain cases, We may refuse the deletion of such data (for example: the processing of personal data is necessary to comply with a certain legal obligation or to establish, exercise or defend legal claims);
- **Right to restriction of processing** – where certain conditions are in place (for example: the processing of certain personal data of yours is unlawful, but you do not want this data to be deleted), you have the right to request restriction of the way in which your personal data is processed;
- **Right to portability** – when your personal data is provided to us by you and processed in an automated way, you have the right to request that your personal data be transmitted to you in a structured, commonly used and machine-readable format, as well as to be transferred to another data controller, if technically feasible;

- **Right to object** – you have the right, at any time, to object to the processing of your personal data for specific purposes, in which case we will stop using the personal data for the specific purpose, unless we have overriding legitimate grounds for doing so (for example: you have the right, at any time, to object to the processing of your personal data for direct marketing purposes, in which case we will cease processing your personal data for these purposes without undue delay);
- **Right to object to automated processing, including profiling** – you have the right not to be subject to a decision that is based only on automated processing of your personal data, including profiling, and you also have all the rights that arise for you in case you are subject to the legal consequences of such processing;
- **Right to withdraw your consent to processing** – in case we process your personal data on the basis of consent granted, at any time, you have the right to withdraw your consent. Withdrawal will not affect the lawfulness of the processing based on consent prior to its withdrawal.

In the event that, at the request of a User, we delete his/her personal data from our database, we will store only the information that may be necessary to protect our legitimate interests or to public authorities. We may refuse to provide this information if this would be impossible or require a disproportionate amount of effort. In the event that we are required to transfer personal data to another controller, to correct or delete personal data, to restrict the processing of personal data or to terminate such processing, to provide information about the recipients to whom the personal data has been provided, for which rectification, deletion or restriction of processing is requested, or to provide access to personal data, and in case of concerns about the identity of the User who made the request, we may first request additional information in order to confirm the identity of the data subject in question. All the above requests will be forwarded to that third party (to whom all or part of your personal data has been transferred (as set out in Part IX above). The exercise of the above rights is free of charge for the Users, except where the requests made are manifestly unfounded or excessive. In such a case, we may either charge a reasonable fee to comply with the request or refuse to take action on the request. Users may exercise the above rights by contacting us by email at: [info@travelcocktails.com](mailto:info@travelcocktails.com)

#### XI. COMPLAINT TO A SUPERVISORY AUTHORITY

In case you believe that your personal data is not processed lawfully or that any of your rights related to the protection of personal data has been violated, you have the right to submit a complaint to the competent supervisory authority for personal data protection referred to in Part III above of the Personal Data Protection Policy. You also have the right to seek protection of your rights in court. In case of links to other websites on the Website, we recommend that you carefully read the personal data protection/privacy policies of these other websites, because when you visit these pages, your personal data may be processed by the websites in question.

We reserve the right to change the Privacy Policy, at our sole discretion and when we see fit.