

PERSONAL DATA PROTECTION POLICY

NKD world, s.r.o., Žižkova 3774/4E, 040 01 Košice – Juh City District, Company ID (I■O): 56980451, Tax ID (DI■): 2122521434, email: ahoj@navratil.travel

NKD world, s.r.o. hereby notifies its customers that, as controller, it processes their personal data in accordance with the applicable legal regulations, in particular Act No. 18/2018 Coll. on the Protection of Personal Data, as amended (hereinafter the “Personal Data Protection Act”), and Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the “Regulation” or “GDPR”), and in accordance with this personal data protection policy. This personal data protection policy applies to customers and prospective customers of the services of NKD world, s.r.o., as well as to persons on whose behalf such services are ordered, in particular through the domain www.navratil.travel (hereinafter jointly referred to as “Data Subjects”).

ARTICLE I. – CONTROLLER

NKD world, s.r.o.

Žižkova 3774/4E

040 01 Košice – Juh City District

Registered in the Commercial Register of the Municipal Court Košice, Section: Sro, File No. 62468/V

Company ID (I■O): 56980451

Tax ID (DI■): 2122521434

Email: ahoj@navratil.travel

(hereinafter the “Controller”)

ARTICLE II. – PURPOSE OF PERSONAL DATA PROCESSING

The purpose of processing the personal data of Data Subjects may include:

- taking steps prior to entering into a contract, concluding a contract to which the Data Subject is a party, subsequently making payment, delivering the service, and providing any related services as applicable;
- compliance with tax and accounting regulations;
- securing any potential legal claims of the Controller;
- operating the Controller’s website www.navratil.travel and the Controller’s social media pages, e.g., Facebook, Instagram, YouTube (the Controller uses cookies on its website and on its social media pages);
- organizing consumer contests/promotions;
- marketing communications with a Data Subject who is a customer of the Controller (direct marketing, e.g., in the form of sending advertising, informational, and promotional emails – newsletters);
- marketing communications with a Data Subject who has no prior relationship with the Controller (prospective customer);

- other marketing purposes of the Controller.

ARTICLE III. – LEGAL BASIS FOR PROCESSING

The legal basis for the processing is:

- Section 13(1)(b) of the Personal Data Protection Act, resp. Article 6(1)(b) GDPR – performance of a contract and pre-contractual relations;
- Section 13(1)(c) of the Personal Data Protection Act, resp. Article 6(1)(c) GDPR, in connection with Act No. 595/2003 Coll. on Income Tax, as amended, Act No. 431/2002 Coll. on Accounting, as amended, and other applicable legal regulations – compliance with legal obligations;
- Section 13(1)(f) of the Personal Data Protection Act, resp. Article 6(1)(f) GDPR – the Controller's legitimate interest in securing and enforcing its potential legal claims;
- Section 13(1)(f) of the Personal Data Protection Act, resp. Article 6(1)(f) GDPR – the Controller's legitimate interest in operating and improving the functionality of its website and its social media pages;
- Section 13(1)(f) of the Personal Data Protection Act, resp. Article 6(1)(f) GDPR – the Controller's legitimate interest in carrying out direct marketing toward its customers (e.g., in the form of sending newsletters);
- Section 13(1)(a) of the Personal Data Protection Act, resp. Article 6(1)(a) GDPR – the consent given by the Data Subject (for consumer contests/promotions, marketing communications directed at persons with no prior relationship with the Controller, and other marketing purposes of the Controller).

ARTICLE IV. – SOURCES OF PERSONAL DATA

Personal data is obtained directly from Data Subjects or from persons who order the Controller's services on behalf of a Data Subject (e.g., fellow travelers).

ARTICLE V. – SUBJECT MATTER OF PROCESSING

The subject matter of processing may include:

- basic identification and contact personal data of Data Subjects that has been provided directly by the Data Subjects or by the person ordering the services, and which is necessary to achieve the purpose of processing (in particular first name, last name, address, date of birth, identity document number, email, telephone number) – providing this data is voluntary; however, without providing such data, the contract with the Data Subject cannot be duly performed;
- for the Controller's marketing purposes, the following may be processed, in particular: first name, last name, email, and photographs – providing data for the Controller's marketing purposes is voluntary;
- cookies – the Controller uses cookies on its website that serve the proper operation of the website and the purpose of analyzing website traffic (visit statistics). Cookies are small text files that a website stores on the Data Subject's computer or mobile device while browsing. The Data Subject may control or delete cookies at their discretion; further information is available, for

example, at www.allaboutcookies.org. In such case, however, the Controller's website may not function properly;

- cookies – the Controller uses cookies on its social media pages, such as Facebook, Instagram, and YouTube. These cookies are provided to the Controller by Facebook in anonymized form for the purpose of analyzing traffic on the Controller's social media pages (visit statistics). More information about the cookies used by Facebook can be found at www.facebook.com/policy/cookies/.

The Controller processes personal data only to the extent necessary to fulfill the purpose of such processing.

ARTICLE VI. – CATEGORIES OF RECIPIENTS

Personal data may be disclosed to the following recipients:

- accommodation providers, airlines, transport companies, tour guides, embassies, consulates, local government authorities, insurance companies, cooperating travel agencies and agents, and other parties through whom the Controller provides its services;
- the Controller's external accountant;
- providers of legal and tax advisory services;
- providers of IT and postal services;
- Google – the company providing the Google Analytics service used to analyze traffic on the Controller's website;
- Facebook – the company operating the Controller's page on the Facebook and Instagram social networks, through which personal data of Data Subjects may be disclosed if consent has been granted;
- the Tax Authority;
- the Slovak Trade Inspection Authority;
- courts, law enforcement authorities, bailiffs;
- other authorized entities pursuant to applicable legal regulations.

ARTICLE VII. – TRANSFER OF PERSONAL DATA

In connection with the processing of Data Subjects' personal data for the purpose of performing a contract and within pre-contractual relations, personal data may also be transferred to third countries (outside the European Union), in particular to transit and destination countries pursuant to package travel contracts. Such transfer to these countries is necessary within the scope of pre-contractual relations and for the performance of a contract concluded with, or on behalf of, the Data Subject, and may include countries that do not ensure an adequate level of personal data protection under a decision of the European Commission.

The Controller's domain www.navratil.travel uses the "Google Analytics" service, provided by Google LLC (USA), for the purpose of analyzing traffic on the relevant website. Google LLC participates in the so-called Privacy Shield framework (i.e., it ensures an adequate level of personal

data protection). The Data Subject may opt out of the collection of personal data for this purpose by downloading and installing the Google Analytics Opt-out Browser Add-on.

Where consent has been granted by the Data Subject, personal data may be disclosed through the Controller's page on the Facebook and Instagram social networks. The Facebook and Instagram social networks are operated by Facebook, Inc. (USA), which participates in the so-called Privacy Shield framework (i.e., it ensures an adequate level of personal data protection). The Controller uses cookies on its social media pages. These cookies are provided to the Controller by Facebook in anonymized form for the purpose of analyzing traffic on the Controller's social media pages (visit statistics). More information about the cookies used by Facebook can be found at www.facebook.com/policy/cookies/.

ARTICLE VIII. – RETENTION PERIOD

Personal data will be retained for the duration of the purpose of processing, i.e., at minimum for the duration of the contractual relationship and, to the extent necessary, until the expiration of the limitation periods for asserting any potential legal claims, and for the archiving period specified by applicable legal regulations, but in all cases at least until the conclusion of all proceedings relating to legal claims. Where processing is based on the Data Subject's consent, the personal data will be processed for this purpose for no longer than the duration of the consent granted. The Data Subject may control or delete cookies at their discretion; further information is available, for example, at www.allaboutcookies.org. In such case, however, the Controller's website may not function properly.

ARTICLE IX. – MEASURES TO PROTECT PERSONAL DATA

The Controller processes personal data in accordance with applicable legal regulations, in particular the Personal Data Protection Act and the Regulation. The Controller uses state-of-the-art technologies for the secure storage and transfer of data and regularly attends to the professional training of its personnel.

ARTICLE X. – RIGHTS OF DATA SUBJECTS

A Data Subject whose personal data is processed has the following rights in connection with the processing of their personal data:

- the right to request access from the Controller to the personal data concerning them and information about its processing (including confirmation as to whether or not processing is taking place);
- the right to rectification of inaccurate personal data and completion of incomplete personal data;
- the right to erasure of personal data or restriction of processing (in particular where the purpose of processing has ceased to exist, consent has been withdrawn, or unlawful processing is taking place; erasure of personal data is possible only after the expiration of the statutory or contractual retention periods);
- the right to object to processing;
- the right to data portability;
- where processing is based on consent, the right to withdraw such consent at any time;

- the right to lodge a complaint with the supervisory authority, i.e., the Office for Personal Data Protection of the Slovak Republic (proceedings pursuant to Section 100 of the Personal Data Protection Act).

The Controller will provide Data Subjects, at any time and free of charge, with information as to what personal data has been collected about them and for what purpose. Data Subjects wishing to exercise these rights may contact the Controller at the following email address: ahoj@navratil.travel, or by mail at NKD world, s.r.o., Žižkova 3774/4E, 040 01 Košice – Juh City District.

The Controller is entitled to charge a fee for providing information only in cases provided for under the Personal Data Protection Act or the Regulation (e.g., in the case of a manifestly unfounded or repetitive request). To obtain information, the Data Subject must identify themselves as the person about whom the information is to be provided, or demonstrate that they are authorized to receive information relating to a third party.

ARTICLE XI. – RIGHT TO WITHDRAW CONSENT

Where processing is based on consent, the Data Subject has the right to withdraw their consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. The Data Subject may withdraw consent at any time by notifying the Controller via the email address ahoj@navratil.travel, or by mail at the address NKD world, s.r.o., Žižkova 3774/4E, 040 01 Košice – Juh City District.

In the case of newsletters sent by email, it is sufficient for the Data Subject to withdraw their consent by clicking the unsubscribe link at the bottom of the relevant email. In the event of doubt as to identity, the Controller may require proof of identity or another means of authenticating the withdrawal of consent.

ARTICLE XII. – RIGHT TO OBJECT TO PROCESSING

Data Subjects have the right, at any time, to object to the processing of their personal data carried out on the basis of the Controller's legitimate interests. The Controller may not continue to process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the rights or interests of the Data Subject, or grounds for the establishment, exercise, or defense of a legal claim. If a Data Subject objects to the processing of personal data for direct marketing purposes, the Controller will no longer process such personal data for direct marketing purposes.

Data Subjects have the right to object by sending a message to the email address ahoj@navratil.travel, or by mail to the address NKD world, s.r.o., Žižkova 3774/4E, 040 01 Košice – Juh City District.

In the case of newsletters sent as part of direct marketing by email, it is sufficient for the Data Subject to object to the processing by clicking the unsubscribe link at the bottom of the relevant email. In the event of doubt as to identity, the Controller may require proof of identity.

ARTICLE XIII. – SUPERVISORY AUTHORITY

In handling personal data, the Controller complies with all applicable legislative rules and security measures. Should a Data Subject consider it necessary and disagree with the manner in which their personal data is being processed, they may contact:

Office for Personal Data Protection of the Slovak Republic
Registered office: Hraničná 12, 820 07 Bratislava

ARTICLE XIV. – FINAL PROVISIONS

- This personal data protection policy forms part of the Controller's general terms and conditions.
- This policy is published on the Controller's domain www.navratil.travel in the "Personal Data Protection" section.
- This policy is effective as of October 1, 2025, and is regularly reviewed and updated.