

Privacy Notice

Planit Travel is committed to protecting your personal data, in accordance with Applicable Law, in particular Chapter 586 of the Laws of Malta on Data Protection and 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, or as it is more commonly known, the General Data Protection Regulation (GDPR).

One of your rights under the GDPR is that you must be informed when your Personal Data is processed by any organisation. You also have the right to know the details and purposes of that processing. This Privacy Notice therefore describes our practices to the personal data of visitors of www.planit247.eu and make use of our online facilities.

For all our services, Planit Travel, as the Data Controller, having its address at 187, Nazju Ellul Street, Gzira GZR, 1629, Malta, is responsible for the processing of Personal Data it receives from you.

What this Privacy Notice covers

We are committed to doing the right thing when it comes to how we collect, use and protect your Personal Data, which is defined as any information relating to an identified or identifiable natural person, such as a name, email address, passport number or identity card number, amongst others. Your privacy matters to us, so please do take the time to read this privacy policy which explains:

- What types of Personal Data we collect and why we collect it.
- When and how we may share Personal Data with other organisations.
- The choices you have, including how to access and update your Personal Data.

Personal data we collect

Most of the Personal Data which we may collect about you through this website and our related online facilities and services is given to us only if you choose to give it to us. Such information may be requested from you when you fill in a field (e.g. to sign up for our newsletter or fill in any other form with your questions and comments) or any other form or application downloaded through or from Planit Travel's Website. If you send us emails, then the personal data we process will depend on what you send us in the email. The below sections provide further information as to which data is collected through specific means:

1. When you register for any of our services, you may provide us with:

- Your personal details, including your name, address, email address, phone number and date of birth, marital status, frequent flyer details and any special travel requests you indicate while registering your account with planit.com.mt.
- Your account login details, such as your username and the security question and answer that you chose. We do not have access to the password that you chose.

2. When you browse our website, we may collect:

- Travel preferences.
- Information about your browsing behaviour on our website.
- Information about the way you access our digital services, including operating system, IP address, online identifiers and browser details.

3. When you buy our travel services, we may collect:

- Passenger information, passport details, other ID document details.
- Insurance details.
- Any specific dietary or meal requests.
- Information about your browsing behaviour on our website.
- Information about when you click on one of our adverts, including those shown on other organisations' websites.
- Information about the way you access our digital services, including operating system, IP address, online identifiers and browser details.

N.B. Credit card payments are entirely managed by a third-party payment gateway. We do not have access to your complete credit card details and we do not store credit card details.

4. When you contact us, we may collect:

- Personal data you provide when you connect with us, including by email, post and phone or through social media, such as your name, username and contact details.
- Details of emails and other digital communications we send to you
- Your feedback and contributions to customer surveys and questionnaires.

5. Personal data you provide about other individuals:

- We use personal data about other individuals provided by you, such as those people on your booking.
- By providing other people's personal data, you must be sure that they agree to this and you are allowed to provide it. You should also ensure that, where appropriate, they understand how their personal data may be used by us.



Using your personal data

We use your personal data in a variety of ways; what we do with it then depends on the information and the purpose for which we collected, as explained below.

Personal Data	How we use your Personal Data	Why we use your Personal Data
Name + Surname + Email Address	<ul style="list-style-type: none"> - Provide you with the flights, accommodation, or transfers that you want to buy, manage your booking and help you with any refunds you may ask for - Send you information by email, SMS or post, about new products and services - Fraud prevention and detection 	<ul style="list-style-type: none"> - We've got to do this to perform our contract with you (e.g. to confirm payment) if you have a contract with us, or to respond to your queries - To keep you up to date - To prevent and detect fraud against either you or us – unfortunate, but absolutely essential! <p>[Art.6(1)(b), (c), (f) GDPR]</p>
Date of Birth Information	<ul style="list-style-type: none"> - Provide you with the flights, accommodation, or transfers that you want to buy, manage your booking and help you with any refunds you may ask for. 	<ul style="list-style-type: none"> - We've got to do this to perform our contract with you (e.g. to confirm payment) if you have a contract with us, or to respond to your queries <p>[Art.6(1)(b) GDPR]</p>
Contact History with Us	<ul style="list-style-type: none"> - Provide you with customer service and support - Train our Staff 	<ul style="list-style-type: none"> - We've got to do this to perform our contract with you to your best satisfaction - For our team to remain up to scratch so that you get the best possible customer service <p>[Art.6(1)(b),(f) GDPR]</p>
Responses to surveys, competitions and promotions	<ul style="list-style-type: none"> - Run the survey, competition or promotion 	<ul style="list-style-type: none"> - We've got to do this to perform our contract with you once you participate <p>[Art.6(1)(b) GDPR]</p>

Travel Preferences	<ul style="list-style-type: none"> - Provide you with the flights, accommodation, or transfers that you want to buy, manage your booking and help you with any refunds you may ask for. - Carry out market research and internal research and development, and to develop and improve our product range, services, IT systems, security, know-how and the way we communicate with you 	<ul style="list-style-type: none"> - We've got to do this to perform our contract with you (e.g. to confirm payment) if you have a contract with us, or to respond to your queries - To ensure we are giving you what you want, and to stay ahead of the competition <p>[Art.6(1)(b),(f) GDPR]</p>
CCTV Footage	<ul style="list-style-type: none"> - Maintain safety of anyone working in or visiting our offices and for the prevention, detection and prosecution of criminal offences - To establish, exercise or defence our legal rights 	<ul style="list-style-type: none"> - To ensure security and safety for both visitors and employees <p>[Art.6(1)(f) GDPR]</p>

We do not sell your personal data to third parties.

You don't have to give us any of this personal information but if you don't, you may not be able to proceed with any booking of services offered on the website, and you are unlikely to receive an optimal customer experience.

If you under the age of 18 years old, please get your parent/guardian's permission before you provide any personal information to us. We will need to process personal data relating to parents or guardians in that case – and we may also need to request for verification documentation to ensure that consent is given or authorised by the holder of parental responsibility.

As indicated in the above table, we only process your personal data on the basis of a legal ground in accordance with applicable law (GDPR). The existing legal grounds for the processing of personal data are the following:

- Consent
- The processing is necessary for the performance of a contract with you or to take steps at your request prior to entering into a contract;
- The processing is necessary for us to comply with a legal obligation;
- He processing is necessary to protect your vital interests or those of another individual;
- The processing is in the public interest;
- The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

Marketing communications

From time to time we may send you relevant offers and news about our services by email. When you book or register with us we will ask if you would like to receive marketing communications. You can change your marketing preferences online, using the 'unsubscribe' link in our marketing emails, at any time.

Even if you unsubscribe, you may still receive service-related communications from us. For example, confirming bookings you make with us and providing important information about the use of our services.

Sharing personal data

We do not, and will not, sell *any* of your personal data to *any* third party – including your name, address, email address or credit card information. It is not our business to do so – and we want to earn your trust and confidence.

However, we share your data with the following categories of entities as an essential part of being able to provide our services to you:

- i. Companies that are involved in the process of the provision of services to you, such as airlines, accommodation, payment service providers, transport companies, etc;
- ii. Credit reference agencies, law enforcement and fraud prevention agencies, so we can help tackle fraud;
- iii. Professional service providers, such as marketing agencies, advertising partners and website hosts who service us in turn to operate our business;

In most circumstances, we will not disclose personal data without authorisation. However, there may be occasions where we might have to – e.g. with a court order, to comply with legal requirements, and specifically in relation to our services, to satisfy a legal request to state authorities at the point(s) of departure and/or destination for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. We may also be obliged to provide your data for the proper administration of justice, to protect your vital interests, to fulfil your requests, to safeguard the integrity of the relevant websites operated by us or by such related entities or in the event of a corporate sale, merger, reorganisation, dissolution or similar event involving us and/or our subsidiaries and related entities.

When we do share data, we do so on an understanding with the other entities that the data is to be used only for the purposes for which we originally intended.

Protecting your personal data

We know how important it is to protect and manage your personal data. We take appropriate security measures to help protect your personal data from accidental loss and from unauthorised access, use, alteration and disclosure, which measures include:

- Firewalls
- Encryption
- Physical access secured with CCTV and alarm system
- Secure Server

Specifically in relation to our website, we use HTTPS to help keep information about you secure. However, no data transmission over the internet can be guaranteed to be totally secure.



We do our best to keep information you disclose to us secure. However we can't guarantee or warrant the security of any information which you send to us. Please understand however, that no system is perfect or can guarantee that unauthorised access or theft will not occur.

The security of your data also depends on you. Where we have given you or where you have created a password, a username and/or other identification information for access to certain services, you are responsible for keeping these details confidential and should not be disclosed to or shared with anyone. When you do disclose any of these details, you are solely responsible for all activities undertaken where they are used.

Whenever you create a password, then to protect your account you should choose a strong password, meaning it should be lengthy and include a mixture of letters and numbers with mix of CAPS.

Data retention

We will retain your personal data for only as long as it is necessary for the purposes set out in this Privacy Notice. We may also keep hold of some of your information if it becomes necessary or required to meet legal and regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions. After this period, we will securely erase personal data. If data is needed after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to anonymise this data.

About cookies and similar technologies

1. Cookies

Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device. Cookies are then sent back to originating website on each subsequent visit – and they are useful because they allow a website to recognise a user's device and store some information about your preferences or past actions. Cookies help us to provide important features and functionality on our websites and mobile apps, and we use them to improve your customer experience.

There is a distinction between session cookies and persistent cookies and between first party and third party cookies. Session cookies allow actions to be tracked during a single browser session. They are deleted from your device when you close the browser. Persistent cookies remain on your device between sessions and allow a website to "recognise" a user on their return and to remember their preferences, they will remain stored on your device until deleted or they reach a specified expiry date. Both session and persistent cookies can be either first or third-party cookies: a first-party cookie is set by the website being visited. A third-party cookie is issued by a party other than website being visited.

Opting out of Cookies

We use cookies to ensure that we give you the best experience on our website and to allow us to improve our site. By continuing to browse the site without making any changes to your browser settings to restrict or delete cookies you are consenting to our use of cookies in this way.

Browsers can be set to allow you to reject all cookies, or to accept cookies from websites only for the duration of your visit. Some browsers will allow you to reject just third party cookies. If you want to know how to do this please look at the help menu on your browser. Please be aware that if you choose to delete or restrict cookies some features of this website may not work.



How we use Cookies

We use session and persistent cookies for the following purposes:

Strictly necessary cookies: These are essential cookies that are required for the operation of the website and to allow you to use its features. They include, for example, cookies that enable you to log into secure areas of our website and carry out specific tasks.

Analytical/performance cookies: These cookies collect anonymous information about how visitors use our website. This aggregated information is used help us to improve the way our website works.

Functionality cookies: These cookies are used to recognise you when you return to our website, record information about choices you have made and allow us to tailor the website to your needs. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of location preference).

Targeting cookies: These cookies record your visit to our website, the pages you have visited and the links you have followed and information from IP addresses. These cookies will be used to make our website and the advertising displayed on it more relevant to you and your interests.

2. Social media features

Our websites may contain social media features such as Facebook that have their own privacy notices. Please make sure you read their terms and conditions and privacy notice carefully before providing any personal data as we do not accept any responsibility or liability for these features.

Your Rights

You enjoy several rights relating to your personal information.

- (i) **The right to be informed about how your personal information is being used;**
We need to be clear with you about how we process your personal data. We do this through this Privacy Notice, which we will keep as up to date as possible.
- (ii) **The right to access the personal information we hold about you;**
You can access the personal data we hold on you by contacting us via email info@planit247.eu or by post at 187, Nazju Ellul Street, Gzira GZR 1629.
- (iii) **The right to request the correction of inaccurate personal information we hold about you;**
We appreciate feedback from you to ensure that our records are accurate and up-to-date.

If you think that the information we hold about you is inaccurate or incomplete please ask us to correct it by contacting us here [insert]

- (iv) **The right to request that we delete your data, or stop processing it or collecting it**
You can ask us to delete your personal data; however, this is not an absolute right. In spite of a request for erasure, we may be justified to keep personal data which we need to keep, e.g. (i) to comply with a legal obligation, and (ii) in relation to the exercise or defence of any legal claims.
Other than as described above, we will always comply with your request and do so promptly. We would carry out our best efforts to notify any third parties with whom we have shared your personal data about your request so that we could also comply.

- (v) The right to stop direct marketing messages;
- (vi) **The right to object to certain processing based on legitimate interest;**
You have a right to object to our use of your personal information including where we use it for our legitimate interests or where we use your personal information to carry out profiling using automated means.
- (vii) The right to request human intervention if automated processing without human intervention is used to make decisions having legal or similar effects on you;
- (viii) The right to withdraw consent for other consent-based processing at any time;
- (ix) **The right to request that we transfer or port elements of your data either to you or another service provider;**
You have the right to move, copy or transfer your personal data from one organisation to another, if you do wish to transfer your personal data we would be happy to help.

If you ask for a data transfer, we will give you a copy of your personal data in a structured, commonly used and machine readable form. We can provide the personal data to you directly or, if you request, to another organisation.

Please note that we are not required to adopt processing systems that are compatible with another organisation, so it may be that the recipient organisation cannot automatically use the personal data we provide.
When making a transfer request, it would be helpful if you can identify exactly what personal data you wish us to transfer.
- (x) The right to complain to your data protection regulator

We will carry out our best efforts to process your request within one month or, if the request is particularly complex, two months. We can provide you with a copy of your personal data in electronic format or hard copy.

Please appreciate that the rights must be exercised within some limitation – for example, if you ask us for information we can only give you what relates to you and not what relates to other persons. When we receive requests, we may also request that you identify yourself and provide documentation or information for verification (we would not want to disclose information to the wrong person). Unreasonable requests may be subjected to a reasonable fee or refusal to respond but you may also complain to the data protection authority – in Malta, the Information and Data Protection Commissioner.

Changes to our Notice

Our website is continuously under review – new functions and features are periodically added and improved to interface, thus changes to our privacy policy may be required from time to time.



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