

DATA PROTECTION DECLARATION AND PROCESSING GUIDELINE PERSONAL DATA

Effective date: January 1, 2023

This privacy policy governs the processing and protection of personal data of users of the website **schwarzberg-touristik.com** (hereinafter referred to as "Website") by **Monteniko doo**, registered at: **Montenegro, 85310, Budva, Rozino b/b** (hereinafter referred to as "Company", "we").

The company operates in the field of organizing and selling tourist services, including the selection, booking and management of trips.

By using the website, submitting a request, booking a trip or providing personal data, the user confirms that they have read this privacy policy and agree to the processing of their personal data in accordance with the conditions described herein.

1. General Provisions

The company respects users' right to privacy and is committed to...

To ensure the protection of personal data in accordance with applicable legal provisions, including:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation – GDPR);
- the national legislation of Montenegro in the area of data protection.

This privacy policy provides information about:

- which personal data we collect;
- for what purposes we use this data;
- how we protect this data;
- to whom we may disclose data;
- what rights users have.

2. Data Controller

The controller responsible for the processing of personal data is:

Monteniko doo

Business address: Montenegro, 85310, Budva, Rozino b/b

Registration number: **Up I 10-448/2 from July 8th, 2020** Email

address for data protection inquiries: montenikodoo@gmail.com

If users have questions about the processing of personal data, they can contact the company at any time using the contact details provided above.

3. What personal data we collect

The company may process the following categories of personal data:

3.1. Identification data:

- First name and last name;
- Date of birth;
- Nationality;
- Data from identification documents (e.g. passport), insofar as these are necessary for the organization of the trip are required.

3.2. Contact details:

- Email address;
- Telephone number;
- Postal address.

3.3. Travel dates:

- selected travel destination;
- Travel dates;
- Wishes regarding accommodation and services;
 - Information about fellow travelers;
 - special wishes and requirements of the customer.

3.4. Payment information:

- Payment details;
- Information on invoices and refunds.

The company does not store complete credit card details. Payment processing may be handled by external payment service providers.

3.5. Technical data:

The following data may be automatically collected when visiting the website:

- IP address;
- Device type;
- Browser information;

Cookies;

Information about visited pages.

4. Purposes of processing personal data

The company processes personal data exclusively for the following purposes:

- Processing customer inquiries;
- Selection and booking of tourist services;
- Preparation and conclusion of travel contracts;
- Organization of travel;
- Transmission of necessary data to tourism service providers;
- Communication with customers;

Payment processing;

- Fulfillment of legal obligations;
 - Improvement of service quality;
 - Sending of advertising and informational messages (only with the user's consent).
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5. Legal basis for processing

The company processes personal data on the basis of the following legal grounds:

- 1. Fulfillment of a contract** with the customer or performance of pre-contractual measures Measures.
- 2. User consent**, for example:

- for receiving marketing communications;
- for the use of certain cookie categories.

3. Fulfillment of legal obligations.

- 4. Safeguarding the legitimate interests of the company,** provided that this processing does not override the rights and freedoms of the user.
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6. Disclosure of personal data to third parties

To provide tourist services, the company may share necessary personal data with:

Hotels and accommodation providers;

Airlines and transport companies;

Insurance companies;

Visa centers;

- Excursion and activity providers;

Payment service providers;

- IT service providers and booking system providers.

The company only shares data that is necessary for providing the respective service.

When transferring personal data outside the European Economic Area, the company ensures that appropriate safeguards are applied in accordance with the GDPR.

7. Storage period for personal data

The company only stores personal data for as long as is necessary to fulfill the respective processing purposes.

The storage duration depends on:

- the duration of the contractual relationship;
- tax, accounting and legal retention obligations;
- the need to protect the legitimate interests of the company.

After the retention period expires, personal data will be deleted or anonymized.

8. Protection of personal data

The company implements appropriate technical and organizational security measures, including:

- Restriction of employee access to personal data;
 - Use of protected storage systems;
- Access controls;
- Protection of user accounts;
 - Measures to prevent unauthorized access.

Despite all security measures, the transmission of information via the Internet can never be fully guaranteed.

9. Use of cookies

This website may use cookies for:

- the proper functioning of the website;
 - Analysis of website usage;
 - Improvement of the user experience;
- Personalization of offers.

The user can change the cookie settings via their browser settings.

Where legally required, the company obtains the user's consent before using certain cookie categories.

10. Marketing communication

The company only sends advertising and informational messages if the user has given their consent.

The user can revoke the receipt of such messages at any time:

- via the "Unsubscribe" link in emails;
- by contacting the company via email.

Revoking marketing consent does not affect the provision of services already booked.

11. User rights under the GDPR

The user has the following rights:

Right to information

The user can request information about which personal data is being processed.

Right to rectification

The user can request the correction of incorrect or incomplete data.

Right to erasure

The user can request the deletion of personal data, provided there are no legal grounds for further processing.

Right to restriction of processing

The user can request a restriction on the processing of their data.

Right to object

The user can object to certain types of processing.

Right to data portability

The user can receive their personal data in a structured, commonly used and machine-readable format.

Right to withdraw consent

The user can revoke previously granted consent at any time.

To exercise these rights:

Email: montenikodoo@gmail.com

The company answers inquiries within the legally prescribed time limits according to GDPR.

12. Complaints to data protection authorities

If the user believes that the processing of their personal data violates applicable data protection law, they have the right to lodge a complaint with the competent authority.

to submit to the data protection supervisory authority of his country of residence or the country in which the company is based.

13. Data of minors

This website is not intended for persons under the legally required minimum age for independent use.

If personal data of minors is provided for a travel booking, the user confirms that they are legally entitled to do so.

14. Changes to this Privacy Policy

The company may update this privacy policy at any time.

The current version is always published on the website and includes the date of the last update.

Update provided.

15. Contact information

For questions regarding the processing of personal data:

Company: MONTENIKO doo

Address: Montenegro, 85310, Budva, Rozino b/b

Email: montenikodoo@gmail.com

Telephone: +382 69 774 428

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