

CSR – „DATA PROTECTION“ POLICY

1. Introduction

The protection of personal data is a top priority for Mondial GmbH & Co. KG. This Data Protection Policy informs our partner companies about the principles, procedures, and measures we implement to ensure a high level of data protection. It serves as a common basis for the GDPR-compliant processing of personal data within the scope of cooperation in accordance with the General Data Protection Regulation (GDPR) and national data protection laws.

2. Principles and Guidelines

This policy applies to all personal data processed within the framework of cooperation between Mondial GmbH & Co. KG and its partners. This includes in particular:

- » Customer data (e.g. names, contact details, travel documents, special wishes or requirements)
- » Data of partner companies
- » Booking and reservation data
- » Communication data (e.g. email correspondence, telephone notes)

This policy explicitly excludes payment data such as credit card information, bank account details, or other payment information that are processed separately by partner companies or payment service providers. Mondial GmbH & Co. KG does not receive or store such payment data.

3. Definitions

The terms used in this policy correspond to the definitions set out in the GDPR (Art. 4). In particular:

- » Personal data: Information relating to an identified or identifiable natural person, e.g. travelers or employees.
- » Processing: Any operation performed on personal data, e.g. collection, storage, transmission, deletion.
- » Controller: The entity that determines the purposes and means of processing.
- » Processor: Service providers that process personal data on behalf of the controller.

4. Principles of Data Processing

All personal data are processed exclusively according to the following principles:

- » Lawfulness, fairness, and transparency
- » Purpose limitation: Processing only for clearly defined, legitimate travel and booking purposes
- » Data minimization: Collection only of data necessary for booking, processing, and supporting travel arrangements
- » Accuracy: Data are kept up to date and accurate
- » Storage limitation: Data are stored only as long as necessary to fulfill the travel service, legal obligations, or defend against claims

- » Integrity and confidentiality: Technical and organizational measures protect data against unauthorized access and misuse

5. Legal Bases for Processing

The processing of personal data is carried out on the basis of the GDPR, in particular:

- » Art. 6 (1) (b) GDPR (Contract performance): e.g. booking flights, hotels, transfers
- » Art. 6 (1) (c) GDPR (Legal obligation): e.g. retention obligations under commercial and tax law
- » Art. 6 (1) (f) GDPR (Legitimate interests): e.g. customer service, internal organization
- » Art. 9 (2) GDPR (Special categories of data, e.g. health data): only with the explicit consent of the customer, for example in connection with special travel requirements (e.g. accessibility, medical assistance)

6. Rights of Data Subjects

Travelers and other data subjects may exercise their rights under the GDPR:

- » Right of access (Art. 15 GDPR)
- » Right to rectification (Art. 16 GDPR)
- » Right to erasure (Art. 17 GDPR)
- » Right to restriction of processing (Art. 18 GDPR)
- » Right to data portability (Art. 20 GDPR)
- » Right to object (Art. 21 GDPR)

Partner companies support Mondial GmbH & Co. KG in fulfilling these rights, in particular with regard to access or erasure requests.

7. Obligations of Partner Companies

Our partner companies undertake to comply with data protection requirements when processing personal data and in particular to:

- » Use data exclusively for the agreed travel purposes
- » Refrain from unauthorized disclosure to third parties
- » Provide regular data protection training to employees
- » Implement appropriate technical and organizational measures to protect data
- » Inform Mondial GmbH & Co. KG without delay in the event of data breaches
- » Process data only in accordance with documented instructions when acting as processors

8. Technical and Organizational Measures (TOM)

Mondial GmbH & Co. KG and its partners implement appropriate security measures, such as:

- » Secure booking and communication systems
- » Encrypted data transmission (e.g. TLS)
- » Access restrictions and role-based permissions
- » Logging of access and booking activities



- » Emergency concepts and regular data backups

9. Data Breaches

In the event of a data breach (e.g. unauthorized access, loss of customer data), Mondial GmbH & Co. KG will notify the competent supervisory authority in accordance with Art. 33 GDPR and, if required, inform affected persons pursuant to Art. 34 GDPR.

Partner companies are obliged to report data protection incidents promptly and in full to datenschutz@mondial.at.

10. Data Protection Officer / Contact

Mondial GmbH & Co. KG, represented by Mag. Gregor Kadanka, is responsible. An internal data protection and compliance team monitors compliance with all requirements and coordinates ongoing improvements.

For questions or communications regarding data protection, please use the following contact address:

- » datenschutz@mondial.at

11. Amendments to this Policy

Mondial GmbH & Co. KG reserves the right to amend this Data Protection Policy as necessary, in compliance with legal requirements. Partner companies will be informed of any changes in good time.

In addition to this policy, the general privacy statement for end customers applies, available at <https://www.mondial.at/en/data-protection/>