

Privacy Policy and Data Protection – In accordance with the EU GDPR – Effective from May 25, 2018

We are very pleased that you have shown interest in our company. The protection of personal data is a particularly high priority for the management of Aura Travel agency. The use of the Aura Travel agency's website is generally possible without providing personal data; however, if a data subject wishes to use special services provided by our company via the website, the processing of personal data may become necessary. If the processing of personal data is necessary and there is no legal basis for such processing, we generally obtain the consent of the data subject.

The processing of personal data, such as the name, address, email address, or telephone number of a data subject, shall always be in line with the General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to Aura Travel. Through this data protection statement, our agency would like to inform the general public about the nature, scope, and purpose of the personal data we collect, use, and process. Furthermore, data subjects are informed of their rights under this data protection statement.

Aura Travel, as the controller, has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, for example, by telephone.

1. DEFINITIONS

The data protection declaration of Aura Travel is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our privacy statement should be legible and understandable to the general public, as well as to our customers and business partners. To ensure this, we would first like to explain the terminology used.

In this data protection declaration, we use, among others, the following terms: **a)**

Personal Data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b) Data Subject

A data subject is any identified or identifiable natural person whose personal data is processed by the controller responsible for the processing. **c) Processing**

Processing is any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. **d) Restriction of Processing**

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future. **e) Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements. **f) Pseudonymization**

Pseudonymization is the processing of personal data in such a manner that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Controller or Controller Responsible for the Processing

The controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. **h) Processor**

A processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. **i) Recipient**

A recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.

j) Third Party

A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data. **k) Consent**

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.

2. NAME AND ADDRESS OF THE CONTROLLER

The controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in the Member States of the European Union and other provisions related to data protection is:

VIŠINSKA DELA d.o.o

Erjavčeva ulica 5

1234 Mengeš

Slovenia

Phone: +386 70 804 245

Email: info@aura-travel.eu

Website: <https://aura-travel.eu>

3. COOKIES

The Aura Travel website uses cookies. Cookies are text files that are stored on a computer system via an internet browser.

Many websites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a string of characters by which websites and servers can be assigned to the specific internet browser in which the cookie was stored. This allows visited websites and servers to differentiate the individual browser of the data subject from other internet browsers that contain different cookies. A specific internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Aura Travel can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize the users of our website. The purpose of this recognition is to make it easier for users to utilize our website. For example, the user of a website that uses cookies does not have to enter access data each time the website is accessed, as this is taken over by the website and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the items that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an internet browser or other software programs. This is possible in all popular internet browsers. If the data subject deactivates the setting of cookies in the internet browser used, not all functions of our website may be fully usable.

4. COLLECTION OF GENERAL DATA AND INFORMATION

The Aura Travel website collects a series of general data and information when a data subject or an automated system accesses the website. These general data and information are stored in the server log files. Collected may be: (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the website, (6) an Internet Protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Aura Travel does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website and its advertising, (3) ensure the long-term viability of our IT systems and website technology, and (4) provide law

enforcement authorities with the information necessary for criminal prosecution in the case of a cyber-attack. Therefore, Aura Travel analyzes anonymously collected data and information statistically, with the aim of increasing data protection and data security of our agency, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

5. REGISTRATION ON OUR WEBSITE

An individual data subject has the option to register on the controller's website by providing personal data. The specific personal data transmitted to the controller depends on the input form used for registration. The personal data entered by the data subject is collected and stored exclusively for internal use by the controller and for their own purposes. The controller may arrange for the data to be transferred to one or more processors (e.g., a parcel service), who also use the personal data for an internal purpose attributable to the controller.

When registering on the controller's website, the IP address assigned by the Internet Service Provider (ISP) and used by the data subject, along with the date and time of registration, is also stored. This data is stored to prevent misuse of our services and to allow investigation of any criminal offenses if necessary. Such storage is essential to protect the controller. This data will not be shared with third parties unless there is a legal obligation to do so or the transfer is necessary for law enforcement purposes.

The voluntary provision of personal data during registration enables the controller to offer the data subject content or services that, by their nature, can only be provided to registered users. Registered individuals can modify or delete the personal data provided during registration at any time.

The controller will, at any time upon request, provide any data subject with information about the personal data stored about them. Furthermore, the controller will rectify or erase

personal data at the request or instruction of the data subject, provided there are no legal obligations to retain such data. All employees of the controller are available to the data subject as contact persons in this regard.

6. CONTACT POSSIBILITY VIA THE WEBSITE

The website of Aura Travel contains information that enables quick electronic contact with our company and direct communication with us, including a general address for email correspondence (info@aura-travel.eu). If a data subject contacts the controller via email or the contact form, the personal data transmitted by the data subject is automatically stored. Such personal data transmitted voluntarily by the data subject to the controller is stored for the purpose of processing or contacting the data subject. This personal data is not transferred to third parties.

7. ROUTINE DELETION AND BLOCKING OF PERSONAL DATA

The controller processes and stores the personal data of the data subject only for the period necessary to achieve the storage purpose or as permitted by the European legislator or other competent legislators in laws or regulations to which the controller is subject.

If the storage purpose is no longer applicable or the storage period prescribed by the European legislator or another competent legislator expires, the personal data is routinely blocked or deleted in accordance with legal requirements.

8. RIGHTS OF THE DATA SUBJECT

a) Right to confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller confirmation as to whether or not personal data concerning them is being processed. If a data subject wishes to exercise this right, they may contact any employee of the controller at any time.

b) Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about their stored personal data at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- The purposes of the processing;
- The categories of personal data concerned;
- The recipients or categories of recipients to whom the personal data has been or will be disclosed, particularly recipients in third countries or international organizations;
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing concerning the data subject, or to object to such processing;
- The existence of the right to lodge a complaint with a supervisory authority;
- Where the personal data is not collected from the data subject, any available information as to its source;
- The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR, and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

In addition, the data subject shall have the right to obtain information as to whether personal data is transferred to a third country or to an international organization. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. **c) Right to rectification**

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

d) Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning them without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- The data subject withdraws consent on which the processing is based according to Article 6(1)(a) or Article 9(2)(a) GDPR, and where there is no other legal ground for the processing;
- The data subject objects to the processing pursuant to Article 21(1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) GDPR;
- The personal data has been unlawfully processed;
- The personal data must be erased for compliance with a legal obligation under Union or Member State law to which the controller is subject;
- The personal data has been collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

If one of the aforementioned reasons applies and a data subject wishes to request the erasure of personal data stored by Aura Travel, they may contact any employee of the controller at any time. An employee of Aura Travel shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested the erasure of any links to, or copies or replications of, that personal data, where processing is not required. **e) Right to restriction of processing**

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;
- The controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise, or defense of legal claims;
- The data subject has objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Aura Travel, they may contact any employee of the controller at any time. **f) Right to data portability**

Each data subject shall have the right granted by the European legislator to receive the personal data concerning them, which was provided to a controller, in a structured, commonly used and machine-readable format. They shall have the right to transmit that data to another controller without hindrance from the controller to which the personal data was provided, where:

- The processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR, or on a contract pursuant to Article 6(1)(b) GDPR; and
- The processing is carried out by automated means.

In exercising their right to data portability pursuant to Article 20(1) GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and where it does not adversely affect the rights and freedoms of others. **g) Right to object**

Each data subject shall have the right granted by the European legislator to object, on grounds relating to their particular situation, at any time, to processing of personal data concerning them which is based on Article 6(1)(e) or (f) GDPR. This also applies to profiling based on those provisions.

Aura Travel shall no longer process the personal data in the event of the objection unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defense of legal claims.

If Aura Travel processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning them for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to processing for direct marketing purposes, Aura Travel shall no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to their particular situation, to object to processing of personal data concerning them by Aura Travel for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To exercise the right to object, the data subject may contact any employee of Aura Travel. Furthermore, in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject is free to exercise their right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them, unless the decision:

1. Is necessary for entering into, or the performance of, a contract between the data subject and a data controller;
2. Is authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests...

11. PROVISIONS ON DATA PROTECTION REGARDING THE USE OF GOOGLE+

This website has integrated the Google+ button as a component. Google+ is a so-called social network. A social network is an online social meeting point, a web-based community that typically allows users to communicate and interact with each other in a virtual space. It may serve as a platform for the exchange of opinions and experiences or enable the transmission

of personal or business-related information to the online community. Google+ allows users to create private profiles, upload photos, and network via friend requests.

The operating company of Google+ is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

With each visit to an individual page of this website where the Google+ button is integrated, the internet browser on the data subject's IT system automatically downloads the display of the respective Google+ button from Google via the Google+ component. As part of this technical procedure, Google is informed about which specific subpage of our website was visited by the data subject. More information about Google+ can be found at <https://developers.google.com/+>.

If the data subject is simultaneously logged into Google+, Google recognizes with each visit to our website by the data subject—and during the entire duration of their stay on our website—which specific subpages of our site they visited. This information is collected via the Google+ button and is associated by Google with the respective Google+ account of the data subject.

If the data subject clicks the Google+ button integrated on our website and thereby gives a Google+ 1 recommendation, Google links this information to the personal Google+ user account of the data subject and stores the personal data. Google stores the Google+ 1 recommendation of the data subject and makes it publicly available in accordance with the terms accepted by the data subject. The Google+ 1 recommendation made by the data subject may later be stored and processed along with other personal data such as the Google+ account name used and the stored profile picture in other Google services, such as Google search results, the data subject's Google account, or in other places such as websites or in relation to advertisements.

Google may also link the visit to this website with other personal data stored by Google. Google further records this personal data for the purpose of improving or optimizing various Google services.

Through the Google+ button, Google receives information that the data subject has visited our website if they are logged in to Google+ at the time of accessing our site. This occurs regardless of whether the data subject clicks the Google+ button or not.

If the data subject does not want their personal data transmitted to Google, they may prevent such transmission by logging out of their Google+ account before accessing our website.

Additional information and Google's privacy policy can be found at <https://www.google.com/intl/en/policies/privacy/>. More Google+ references are available at <https://developers.google.com/+web/buttons-policy>.

12. PROVISIONS ON DATA PROTECTION REGARDING THE USE OF GOOGLE ADWORDS

This website has integrated Google AdWords. Google AdWords is an online advertising service that allows advertisers to place ads in Google search engine results and on the Google advertising network. Google AdWords enables advertisers to predefine specific keywords so that an ad appears in Google's search results only when the user enters a keyword-relevant search term. Within the Google advertising network, ads are distributed to relevant websites via an automatic algorithm considering the predefined keywords.

The operating company for Google AdWords is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

The purpose of Google AdWords is to promote our website by displaying interestrelevant advertising on third-party websites and in Google search engine results, and by placing third-party advertisements on our own site.

If a data subject reaches our website via a Google ad, a conversion cookie is stored in the data subject's IT system via Google. (The definition of cookies is explained above.) This cookie expires after 30 days and is not used to identify the data subject. If the cookie has not expired, it is used to determine whether certain subpages, such as the shopping cart of an online store system, were visited on our website. Through the conversion cookie, both Google and we can understand whether a person who clicked on an AdWords ad generated a sale, that is, whether they made or canceled a purchase.

The data and information collected using the conversion cookie are used by Google to generate visit statistics for our website. These statistics help determine the total number of users who were shown AdWords ads and assess the success or failure of each AdWords ad and optimize future AdWords campaigns. Neither we nor other Google AdWords advertisers receive information from Google that could identify the data subject.

The conversion cookie stores personal data, such as the websites visited by the data subject. Each time our website is visited, personal data, including the IP address of the internet connection used by the data subject, is transmitted to Google in the United States. These personal data are stored by Google in the USA. Google may transfer this personal data collected through technical procedures to third parties.

The data subject can prevent the setting of cookies by our website at any time, as described above, by adjusting the settings of the internet browser used and thus permanently deny the setting of cookies. Such a setting would also prevent Google from placing a conversion cookie on the data subject's IT system. In addition, a cookie already set by Google AdWords can be deleted at any time via the internet browser or other software.

The data subject also has the possibility to object to interest-based advertising by Google. To

do so, they must access www.google.de/settings/ads from each browser they use and configure the desired settings.

More information and the applicable Google privacy policy can be found at <https://www.google.com/intl/en/policies/privacy/>.

13. PROVISIONS ON DATA PROTECTION REGARDING THE USE OF INSTAGRAM

The controller has integrated components of the Instagram service on this website. Instagram is an audiovisual platform that allows users to share photos and videos and distribute such data across other social networks.

The operating company of Instagram services is Instagram LLC, 1 Hacker Way, Building 14, First Floor, Menlo Park, CA, UNITED STATES.

Each time one of the individual pages of this website operated by the controller and on which an Instagram component (Insta button) is integrated is accessed, the internet browser on the data subject's IT system is automatically prompted to display the corresponding Instagram component. During this technical process, Instagram becomes aware of which specific subpage of our website was visited by the data subject.

If the data subject is logged into Instagram at the same time, Instagram detects with each visit to our website which specific subpages they visited. This information is collected by the Instagram component and associated with the data subject's Instagram account. If the data subject clicks one of the Instagram buttons integrated on our website, Instagram links this data to the personal Instagram user account and stores the personal data.

Instagram receives information via the Instagram component that the data subject has visited our website, provided that they are logged into Instagram at the time of access. This happens regardless of whether the person clicks the Instagram button or not. If such a transfer of information to Instagram is not desired, the data subject can prevent it by logging out of their Instagram account before accessing our website.

Further information and Instagram's data protection provisions can be found at

<https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

14. PROVISIONS ON DATA PROTECTION REGARDING THE USE OF YOUTUBE

This website has integrated components of YouTube. YouTube is an online video portal that enables video publishers to upload video clips free of charge and allows other users to view, rate, and comment on them for free. YouTube permits the publication of all types of videos, allowing full movies, TV shows, music videos, trailers, and usergenerated content to be accessed.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, UNITED STATES. YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

With each visit to an individual page of this website containing a YouTube component (YouTube video), the internet browser on the data subject's IT system is automatically prompted to download the corresponding YouTube component. Further information about YouTube can be obtained at <https://www.youtube.com/yt/about/en/>. During this technical process, YouTube and Google gain knowledge of which specific subpage of our website was visited by the data subject.

If the data subject is logged into YouTube, YouTube recognizes which specific subpage of our website the data subject visited with each access to a page containing a YouTube video. YouTube and Google collect this information and associate it with the respective YouTube account of the data subject.

YouTube and Google receive information via the YouTube component that the data subject has visited our website if the data subject is logged into YouTube at the time of accessing our site; this occurs regardless of whether the person clicks the YouTube video or not. If such a transmission is not desirable, the data subject can prevent it by logging out of their YouTube account before visiting our website.

YouTube's privacy policy, available at <https://www.google.com/intl/en/policies/privacy/>, provides information about the collection, processing, and use of personal data by YouTube and Google.

15. METHOD OF PAYMENT: PROVISIONS ON DATA PROTECTION REGARDING THE USE OF PAYPAL AS A PAYMENT PROCESSOR

This website has integrated components of PayPal. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which are virtual private or business accounts. PayPal can also process virtual payments via credit cards if the user does not have a PayPal account. A PayPal account is managed through an email address, so traditional account numbers are not used. PayPal allows online payments to third parties or receipt of payments. PayPal also acts as a trustee and offers buyer protection services. The European operating company of PayPal is PayPal (Europe) S.à.r.l. & Cie. SCA, 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg.

If a data subject selects "PayPal" as a payment option during the ordering process in our online shop, we automatically transmit the data of the data subject to PayPal. By choosing this payment option, the data subject consents to the transfer of personal data required for payment processing.

The personal data transmitted to PayPal is usually first name, last name, address, email address, IP address, phone number, mobile phone number, or other data necessary for payment processing. The processing of the purchase contract also requires such personal data that are related to the respective order.

The transfer of the data is intended for payment processing and fraud prevention. The controller will transmit personal data to PayPal, particularly if there is a legitimate interest for the transfer. The personal data exchanged between PayPal and the controller may be transmitted by PayPal to credit agencies. This transmission is intended for identity and creditworthiness checks.

PayPal may pass personal data on to affiliated companies and service providers or subcontractors to the extent that this is necessary to fulfill contractual obligations or for data processing in the order.

The data subject has the possibility to revoke consent for the handling of personal data from PayPal at any time. A revocation does not affect personal data that must be processed, used, or transmitted for (contractual) payment processing.

The applicable PayPal data protection provisions can be found at:

<https://www.paypal.com/us/webapps/mpp/ua/privacy-full>

15.1 METHOD OF PAYMENT: PROVISIONS ON DATA PROTECTION REGARDING THE USE OF STRIPE AS A PAYMENT PROCESSOR

If you choose to make a payment on our website, payment processing is carried out through the payment service provider Stripe Payments Europe, Ltd., The One Building, 1 Grand Canal Street Lower, Dublin 2, Ireland (hereinafter: “Stripe”).

When you make a payment, the data necessary for the transaction is transmitted directly to Stripe. This data typically includes:

- your name,
- billing address,
- email address,
- payment information (e.g., credit card number, expiry date, CVC code), and
- transaction-related details such as the amount and currency.

Stripe processes this data as an independent data controller in order to execute the payment, prevent fraud, and comply with legal obligations (e.g., anti-money-laundering laws). The processing of personal data by Stripe is governed by Stripe’s own Privacy Policy, available at: <https://stripe.com/privacy>.

We do not store or have access to your full payment details (such as your complete credit card number). The legal basis for processing your payment data is Article 6(1)(b) GDPR (performance of a contract) and, where applicable, Article 6(1)(f) GDPR (our legitimate interest in ensuring secure and efficient payment processing).

Stripe may transfer personal data to its parent company, Stripe, Inc., in the United States. These transfers are based on the EU–U.S. Data Privacy Framework and/or Standard Contractual Clauses approved by the European Commission, ensuring an adequate level of data protection.

16. REFOUND & CANCELLATION POLICY

We understand that plans can change, and we aim to make our refund and cancellation process as smooth as possible. Please read the following terms carefully before making your booking.

1. Cancellations and Refunds

- **Full Refund:** Cancellations made at least 14 days (2 weeks) before the retreat start date will receive a 100% refund.
- **Partial Refund:** Cancellations made between 3 and 13 days before the retreat start date will receive a 75% refund (a 25% cancellation fee applies).
- **No Refund:** Cancellations made less than 3 days before the start date, or after the retreat has begun, are non-refundable.

2. How to Request a Refund

All refund or cancellation requests must be sent in writing via email to:

✉ info@aura-travel.eu

Please include your full name, booking reference, and retreat dates in your message.

3. Processing Time

Refunds will be processed within 7–14 business days after confirmation of your cancellation. Refunds are made using the same payment method used for the original booking.

4. Force Majeure

In the event of unforeseen circumstances beyond our control (e.g., natural disasters, travel restrictions, or political instability), Aura Travel reserves the right to reschedule or cancel retreats. In such cases, participants will be offered either a full refund or the option to reschedule for a future date.

5. Non-Refundable Expenses

Please note that Aura Travel is not responsible for any non-refundable expenses incurred by participants (such as flights or travel insurance).

17. LEGAL BASIS FOR PROCESSING

Art. 6(1)(a) GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, such as when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Art. 6(1)(b) GDPR. The same applies to such processing operations necessary for carrying out pre-contractual measures, such as inquiries regarding our products or services.

If our agency is subject to a legal obligation which requires processing of personal data, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1)(c) GDPR. In rare cases, processing personal data may be necessary to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were injured in our agency and their name, age, health insurance data, or other vital information would need to be passed to a doctor, hospital, or third party. Then the processing would be based on Art. 6(1)(d) GDPR.

Finally, processing operations could be based on Art. 6(1)(f) GDPR. This legal basis is used for processing operations which are not covered by any of the above-mentioned legal grounds if processing is necessary for the purposes of the legitimate interests pursued by our agency or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47, sentence 2 GDPR).

18. LEGITIMATE INTERESTS OF THE CONTROLLER OR A THIRD PARTY

Where the processing of personal data is based on Art. 6(1)(f) GDPR, our legitimate interest is to carry out our business in favor of the well-being of all our employees and shareholders.

19. PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

The criterion used to determine the storage period of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, provided it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

20. PROVISION OF PERSONAL DATA AS A STATUTORY OR CONTRACTUAL REQUIREMENT; REQUIREMENT NECESSARY TO ENTER INTO A CONTRACT; OBLIGATION OF THE DATA SUBJECT TO PROVIDE THE PERSONAL DATA; POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE SUCH DATA

We clarify that the provision of personal data is partly required by law (e.g., tax regulations) or can also result from contractual provisions (e.g., information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data that must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our agency signs a contract with them. The non-provision of personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact any employee. The employee explains to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

21. EXISTENCE OF AUTOMATED DECISION-MAKING

As a responsible company, we do not use automatic decision-making or profiling.

This privacy policy was generated by the Privacy Policy Generator of External Data Protection Officers that was developed in cooperation with RC GmbH, which sells used laptops, and the media law attorneys of WBS-LAW.

At Aura Travel, accessible at <https://aura-travel.eu/>, one of our main priorities is the privacy of our visitors. This privacy policy document contains types of information that Aura Travel collects and records and how we use it.

If you have additional questions or require more information about our privacy policy, do not hesitate to contact us by email at info@aura-travel.eu.

22. GENERAL DATA PROTECTION REGULATION (GDPR)

a) We are the data controller.

Aura Travel's legal basis for collecting and using the personal information described in this privacy policy depends on the personal information we collect and the specific context in which we collect the information:

- Aura Travel needs to perform a contract with you.
- You have given Aura Travel permission to do so.
- Processing your personal information is in Aura Travel's legitimate interests.
- Aura Travel needs to comply with the law.

Aura Travel will retain your personal information only for as long as is necessary for the purposes set out in this privacy policy. We will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed about what personal data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or delete the information we have on you.
- The right of rectification.
- The right to object.
- The right of restriction.
- The right to data portability.
- The right to withdraw consent.

b) Log Files

Aura Travel follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and it is part of hosting services