

Data Protection Policy for Stellar Trips

Effective Date: 01.08.2025

1. Introduction

This Data Protection Policy outlines how Stellar Trips (hereafter referred to as "we," "us," or "our") collects, uses, and protects personal data in compliance with the General Data Protection Regulation (GDPR). We are committed to safeguarding your privacy and ensuring that your personal information is processed fairly and lawfully.

2. Scope of the Policy

This policy applies to all personal data collected, processed, or stored by Stellar Trips, including but not limited to:

- Clients
- Employees
- Partners
- Suppliers

3. Definitions

- **Personal Data:** Any information that relates to an identified or identifiable natural person (data subject), such as names, contact details, and payment information.
- **Processing:** Any operation performed on personal data, including collection, storage, use, and deletion.
- **Data Subject:** An individual whose personal data is processed by us.

4. Data Protection Principles

We adhere to the following principles regarding personal data processing:

1. **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and transparently.
2. **Purpose Limitation:** Personal data is collected for specified, legitimate purposes and is not further processed in a manner incompatible with those purposes.
3. **Data Minimization:** We collect only the personal data that is necessary for the purposes of processing.
4. **Accuracy:** We take reasonable steps to ensure that personal data is accurate, complete, and kept up to date.
5. **Storage Limitation:** Personal data is retained only for as long as necessary for the purposes for which it is processed.
6. **Integrity and Confidentiality:** We process personal data in a manner that ensures appropriate security, including protection against unauthorized processing, loss, or damage.

5. Legal Basis for Processing Personal Data

We will only process personal data when one of the following legal bases applies:

- **Consent:** The data subject has given clear consent for us to process their personal data for a specific purpose.
- **Contractual Necessity:** Processing is necessary for the performance of a contract with the data subject.
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which we are subject.
- **Legitimate Interests:** Processing is necessary for our legitimate interests, provided those interests are not overridden by the data subject's rights.

6. Data Collection

We collect personal data through various methods, including:

- Booking forms and Online sign-up forms
- Customer feedback and surveys
- Direct communication via email or phone

The personal data we may collect includes, but is not limited to:

- Name
- Email address
- Phone number
- Travel preferences
- Emergency contact information

7. Data Use

We use personal data for the following purposes:

- To process bookings and payments
- To provide customer support and assistance
- To communicate important information about trips
- To send marketing communications (with consent)
- To comply with legal obligations

8. Data Sharing and Disclosure

We may share personal data with third parties only in the following circumstances:

- With service providers (e.g., airlines, hotels, insurance companies) for the purpose of fulfilling our contractual obligations.
- To comply with legal requirements or respond to lawful requests from public authorities.
- In the event of a merger, acquisition, or sale of assets, with appropriate safeguards in place.

9. Data Retention

We will retain personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Personal data will be securely deleted or anonymized when no longer needed.

10. Data Security

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- Encryption of personal data.
- Access controls to limit access to personal data to authorized personnel only.
- Regular security assessments and audits.

11. Data Subject Rights

Under the GDPR, data subjects have the following rights:

- **Right to Access:** Request access to personal data we hold about you.
- **Right to Rectification:** Request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** Request deletion of personal data when it is no longer necessary for the purposes for which it was collected.
- **Right to Restriction of Processing:** Request the restriction of processing under certain circumstances.
- **Right to Data Portability:** Request the transfer of your personal data to another organization in a structured, commonly used, and machine-readable format.
- **Right to Object:** Object to the processing of personal data in certain situations.

To exercise any of these rights, please contact us using the contact details provided below.

12. Data Breach Notification

In the event of a personal data breach, we will notify the relevant supervisory authority and affected data subjects, where required, within 72 hours of becoming aware of the breach.

13. Changes to the Data Protection Policy

We may update this Data Protection Policy from time to time to reflect changes in our practices or legal obligations. Any changes will be posted on our website, and we encourage you to review this policy periodically.

14. Contact Information

If you have any questions about this Data Protection Policy or our data practices, please contact us at:

- **Email:** legal@stellartrips.eu